FINAL

Environmental Assessment

for the

Renovation of the Former Steam Plant

St Clair County
Scott Air Force Base, Illinois

Prepared By:
375th Civil Engineer Squadron
Environmental Management Flight
Scott Air Force Base, Illinois 62225-5035

September 2005

Report Documentation Page

Form Approved
OMB No. 0704-0188

1. REPORT DATE	2. REPORT TYPE	3. DATES COVERED
SEP 2005		**00-00-2005 to 00-00-2005**

4. TITLE AND SUBTITLE	5a. CONTRACT NUMBER
Final Environmental Assessment for Renovation of the Former Steam Plant St Clair County Scott Air Force Base, Illinois	5b. GRANT NUMBER
	5c. PROGRAM ELEMENT NUMBER
6. AUTHOR(S)	5d. PROJECT NUMBER
	5e. TASK NUMBER
	5f. WORK UNIT NUMBER
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) **375th Civil Engineer Squadron ,Environmental Management Flight,Scott AFB,IL,62225-5035**	8. PERFORMING ORGANIZATION REPORT NUMBER
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)	10. SPONSOR/MONITOR'S ACRONYM(S)
	11. SPONSOR/MONITOR'S REPORT NUMBER(S)

12. DISTRIBUTION/AVAILABILITY STATEMENT
Approved for public release; distribution unlimited

13. SUPPLEMENTARY NOTES

14. ABSTRACT

15. SUBJECT TERMS

16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON
a. REPORT **unclassified**	b. ABSTRACT **unclassified**	c. THIS PAGE **unclassified**	**Same as Report (SAR)**	**90**	

FINDING OF NO SIGNIFICANT IMPACT TO RENOVATE THE FORMER STEAM PLANT SCOTT AIR FORCE BASE, ILLINOIS

Agency: United States Air Force, Headquarters, Air Mobility Command

Background: Pursuant to the President's CEQ regulations, {Title 40 Code of Federal Regulations (CFR) Parts 1500-1508}, the National Environmental Policy Act of 1969 {42 USC §4321, et seq.}, and the Environmental Impact Analysis Process, as promulgated at 32 CFR Part 989, the U.S. Air Force conducted an Environmental Assessment of the potential consequences associated with the renovation of the Former Steam Plant (Building 45) at Scott AFB, IL. The EA considered potential natural resources, environmental, and cultural impacts of the renovation of the Former Steam Plant (hereinafter, "Proposed Action") and listed alternatives. This Finding of No Significant Impact (FONSI) summarizes the results of this EA and provides the U.S. Air Force's rationale for the Proposed Action and No-Action Alternative.

PROPOSED ACTION: The Proposed Action consists of interior renovations to the Former Steam Plant (Building 45) to convert the building to administrative space. In addition to the interior renovations, the project would include removal of the containment dike for a former AST and exterior improvements to prepare the facility for use as administrative space.

Alternatives: The alternative to the Proposed Action is the No-Action. Implementation of the No-Action Alternative does not alleviate the lack of swing space at Scott AFB.

Cultural and Historical Resources: The Proposed Action is located in the Historical District at Scott AFB. Building 45 is listed on the National Register of Historic Places. The State Historic Preservation Office has been notified of this project and has determined that the Proposed Action would have no adverse affect. No artifacts or historical objects are expected to be excavated during construction. In the unlikely event artifacts or historical objects are discovered, construction activities would cease until the Cultural Resources Specialist and Base Historian are notified and the appropriate action is accomplished.

Air Quality: Fugitive dust and construction vehicle exhaust would be generated during construction of the Proposed Action. The estimated values of direct and indirect emissions are below the *de minimus* thresholds specified at 40 CFR 93.153(b)(1). Therefore, the Proposed Action would not increase emissions over baseline emission levels. The Proposed Action would be in compliance with all relevant requirements and milestones contained in the Illinois State Implementation Plan; therefore, a conformity determination would not be necessary.

Hazardous Materials and Waste: The site of the Proposed Action is located in the vicinity of several IRP and AOC sites and there is a potential for contaminated soils to be encountered during construction activities. No impacts related to potential contamination are expected as long as workers follow an approved Health and Safety Plan and Emergency Response Plan. Any potentially contaminated soils encountered during excavation would be stockpiled on-site and disposed of in accordance with appropriate Scott AFB, State, and Federal regulations.

The use of hazardous materials during construction activities would be limited, and generation of hazardous waste would not be anticipated from the Proposed Action. There would be no anticipated impact to human health or the environment during construction activities or from activities associated with implementation of the Proposed Action.

Noise: Some noise impacts would occur during the construction of the Proposed Action. The amount of noise generated from operational activities would be temporary and negligible.

Geology and Soils: The surface area would be disturbed by construction activities at the Proposed Action; however, construction would not negatively affect surface or geological resources. Necessary measures and best management practices would be utilized to prevent soil erosion during and after construction activities. Subsurface soils at the site already contain elevated levels of contaminants and it is not anticipated that the Proposed Action would contribute to further contamination. The portion of the project that was formerly utilized as a vehicle maintenance building would be remediated prior to construction. Placing a concrete parking lot over portions of the subject site would limit the potential for exposure to these soils.

Water Resources: No significant impact to groundwater quality is anticipated from the implementation of the Proposed Action. Groundwater at the site already contains elevated levels of contaminants and it is not anticipated that implementation of the Proposed Action would contribute to further groundwater contamination. Scott AFB is in the process of implementing a Land Use Control Memorandum of Agreement (LUC MOA) that prohibits the use of groundwater as a source of drinking water.

No significant impact to surface water is anticipated as long as proper BMP's are used and any contaminated soil encountered during excavations is properly stockpiled and disposed of in accordance with Scott AFB, State, and Federal regulations.

Due to the lack of detailed information at Spill Site 2 the long-term impacts of potential contaminants can not be completely ruled out. Therefore there is a potential for a long-term minor adverse impact to groundwater.

There are no wetlands or floodplains present at the site of the Proposed Action. Therefore, no impacts are anticipated to these resources.

Safety and Occupational Health: If the Proposed Action is implemented, no unfavorable impacts to occupational health and safety are projected provided workers comply with OSHA regulations and standards during construction activities. The site is known to contain soils contaminated with petroleum products and construction workers would follow an appropriate Health and Safety Plan and Emergency Response Plan to minimize exposure to contaminated soils.

Biological Resources: No biological resources, including endangered or threatened species, or rare fauna and flora inhabit the Proposed Action area. As such, no impacts are probable.

relating to ordnance.

Environmental Justice: There would be no disproportionately high or adverse impact on minority or low-income populations as a result of the Proposed Action.

Indirect and Cumulative Impacts: No impacts are anticipated from site-specific, direct, indirect, or cumulative impacts associated with the Proposed Action.

Relationship Between Short-term Uses and Enhancement of Long-Term Productivity: Implementation of the Proposed Action would facilitate long-term productivity at Scott AFB. The ability to utilize swing space during other renovation projects would minimize impacts created by displacing base personnel or requiring personnel to work in overcrowded conditions.

Irreversible and Irretrievable Commitment of Resources: There would be minor irreversible and irretrievable commitment of resources if the Proposed Action were selected. Military funds would be permanently expended, building materials would be permanently committed for construction, and the area proposed for new construction would be a long-term commitment of resources. However, the overall impact would be considered inconsequential.

Unavoidable Adverse Impacts: There would be no major unavoidable adverse impacts associated with the Proposed Action.

FINDING OF NO SIGNIFICANT IMPACT: Based upon my review of the facts and analyses contained in the attached Environmental Assessment for the Renovation of the Former Steam Plant dated September 2005, I conclude that implementation of the Proposed Action would not have a significant adverse impact, either by itself or cumulatively with other projects at Scott AFB. Accordingly, the requirements of NEPA, the CEQ regulations, and 32 CFR 989 are fulfilled and an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the environmental impact analysis process under Air Force Regulations.

ALAN L. HUNT, JR., Colonel, USAF
Commander

25 Jul 06
DATE

Attachment:
Environmental Assessment

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LIST OF ABBREVIATIONS AND ACRONYMS

ACM	asbestos-containing materials
AFB	Air Force Base
AFH	Air Force Handbook
AFI	Air Force Instruction
AFMAN	Air Force Manual
AICUZ	Air Installation Compatible Use Zone
AQCR	Air Quality Control Region
AOC	area of concern
AST	above ground storage tank
AT/FP	anti-terrorism/force protection
BGP	Base General Plan
BMP	best management practice
bgs	below ground surface
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CES/CEV	Civil Engineering Squadron/Civil Environmental Flight
CFR	Code of Federal Regulation
dB	decibels
DoD	Department of Defense
DoDI	Department of Defense Instruction
EA	Environmental Assessment
EM	Engineer Manual
EMF	Environmental Management Flight
EO	Executive Order
EPA	Environmental Protection Agency
EPC	Environmental Protection Committee
EPCRA	Emergency Planning and Community Right to Know Act
FIP	Federal Implementation Plan
FONSI	Finding of No Significant Impact
FY	Fiscal Year
IEPA	Illinois Environmental Protection Agency
INRMP	Integrated Natural Resource Management Plan
IRP	Installation Restoration Program
LBP	lead-based paint
LUC MOA	Land Use Control Memorandum of Agreement
mgd	million gallons per day
NAAQS	National Ambient Air Quality Standard
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
P2	pollution prevention

LIST OF ABBREVIATIONS AND ACRONYMS (Cont'd)

PPE	personal protective equipment
ppm	parts per million
PCB	polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
ROI	Region of Influence
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SMSA	Standard Metropolitan Statistical Area
TO	Technical Orders
UFC	Unified Facilities Criteria
USAF	United States Air Force
USC	United States Code
UST	underground storage tank

EXECUTIVE SUMMARY

The 375th Civil Engineer Squadron proposes to renovate the Former Steam Plant (Building 45) for use as office space. The Former Steam Plant is located at the intersection of Yonkie and Rimkus Drives. Renovations of the Steam Plant will allow the building to be used as swing workspace for individuals affected by renovations in other locations. In addition to the interior renovations, the project would include removal of the containment dike for a former above ground storage tank and the construction of two parking lots.

This Environmental Assessment (EA) has been prepared in accordance with the *National Environmental Policy Act of 1969* (NEPA), the Council on Environmental Quality regulations [40 Code of Federal Regulations (CFR), sections 1500-1508], and Air Force Instruction 32-7061, *Environmental Impact Analysis Process*, as promulgated at 32 CFR 989. This EA focuses on specific issues and concerns of the Proposed Action and the alternatives that could affect the environment of Scott Air Force Base and the surrounding properties. The alternatives for this EA include the Proposed Action and the No-Action Alternative.

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1.0 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.1 INTRODUCTION

The Proposed Action is located at Scott Air Force Base (AFB) in St. Clair County, Illinois, which is approximately 20 miles east of St. Louis, Missouri. The base comprises approximately 3,600 acres and is located in a predominantly agricultural area. The base is immediately south of Interstate Highway 64 (Figure 1-1), near the cities of O'Fallon and Belleville.

Originally constructed in 1940 the Former Steam Plant (Figure 1-2) provided a central steam heating facility for Scott AFB until it was decommissioned in 1997. A project was completed in August 2004 to remediate lead and asbestos issues within the building and to remove all the components of the Former Steam Plant (boilers, coal bins, piping, etc.). The 375th Civil Engineer Squadron is proposing to convert the building to an administrative facility.

1.2 NEED FOR ACTION

1.2.1 Administrative Space

An ongoing problem at Scott AFB is the extreme shortage of administrative space for base personnel (BGP, 2004). The lack of administrative space is further compounded when existing office space requires renovations or repairs. When existing space requires extensive repairs then base personnel must be dislocated into temporary facilities until the renovations or repairs are completed. Currently there is not sufficient office space at Scott AFB to provide for displaced personnel. The dislocation of personnel has the potential to create inefficiencies as renovation schedules are delayed or as personnel are forced to share limited workspace. The renovation of the Former Steam Plant would provide generic office (swing) space for base personnel.

1.2.2 Parking

In accordance with the method for estimating parking capacity listed in Air Force Handbook (AFH) 32-1084, *Facility Requirements*, the Proposed Action would require approximately 50 parking spaces. In the long-term planned renovations for the Former Steam Plant would create additional office space with the need for another 75 parking spaces. It is anticipated that the construction of a parking lot in the former location of Building 53 would create an additional 40 parking spaces and the removal of the former above ground storage tank (AST) adjacent to the Former Steam Plant would create 50 parking spaces. It is anticipated that the extra parking capacity will be at least partially utilized by the employees in P-40. The future renovations of the second and third floor of the Former Steam Plant are considered a long-term (> 5 years) goal and the need for additional parking spaces would be addressed during the design of that project.

1.3 OBJECTIVE

The objective of this Environmental Assessment (EA) is to evaluate the potential impacts associated with the implementation of the Proposed Action and the No-Action Alternative and to determine the significance of those impacts. If the potential impacts are not considered significant, a Finding of No Significant Impact (FONSI) will be prepared.

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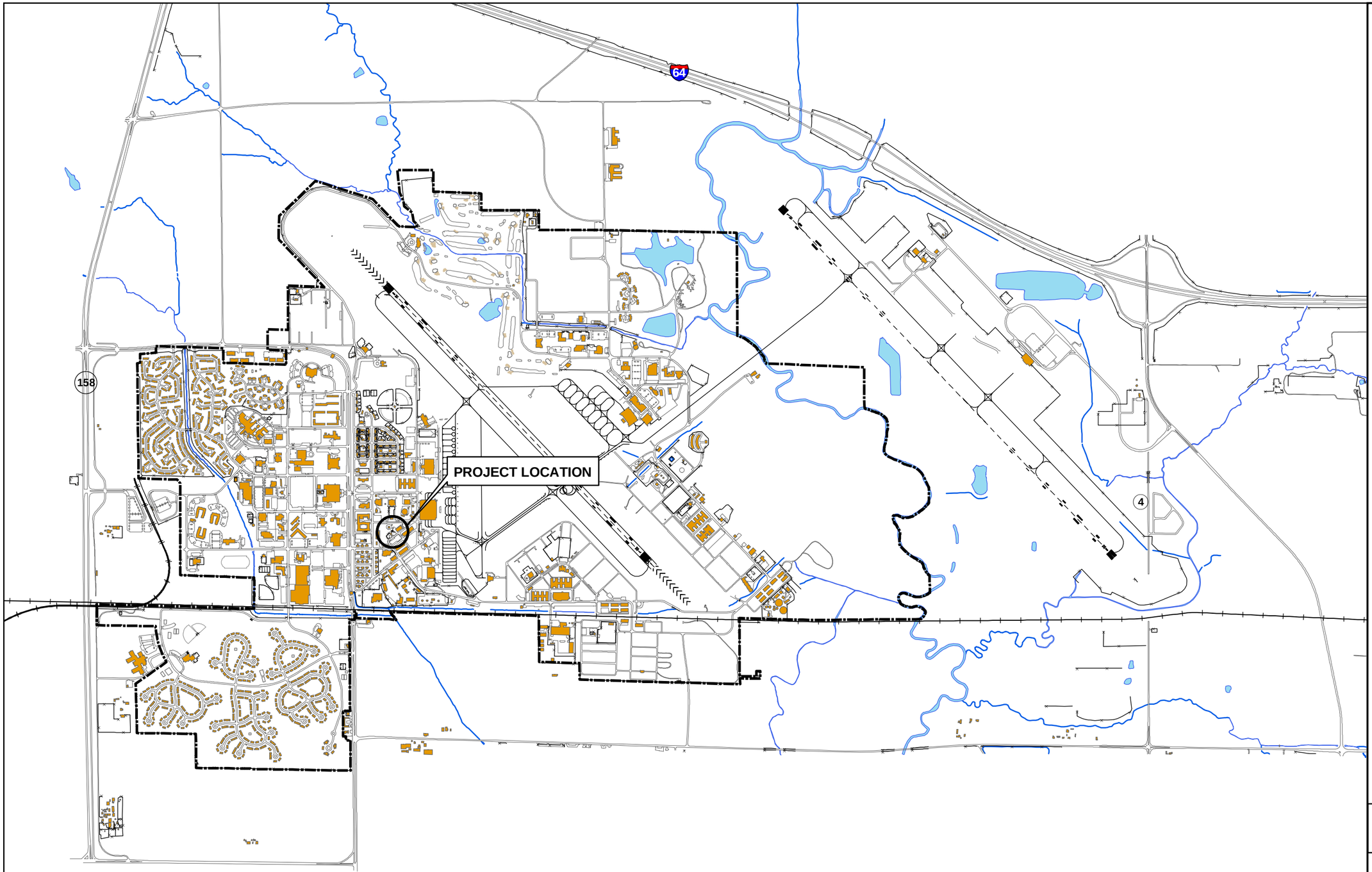
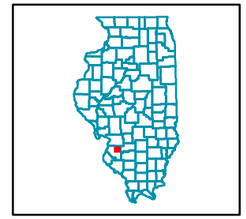


OVERVIEW MAP



LEGEND

- BASE BOUNDARY
- AIRFIELD SURFACE
- BUILDINGS
- SURFACE WATER
- STREAM
- FENCE LINES
- RAILROADS

1,000 500 0 1,000 Feet

1 inch equals 2,000 feet

N
W E
S

Former Steam Plant
Scott Air Force Base

Figure 1-1. Project Location

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1.4 SCOPE OF THE EA

This EA identifies, describes, and evaluates the potential environmental impacts associated with implementation of the Proposed Action and the No-Action Alternative. Furthermore, this document includes an analysis of the impacts of the Proposed Action and the No-Action Alternative as they relate to the following environmental and socioeconomic programs:

- Air Quality
- Noise
- Wastes, Hazardous Materials/Stored Fuel
- Land Use
- Safety and Occupational Health
- Water Resources
- Floodplains and Wetlands
- Biological Resources
- Environmental Management
- Geology and Soils
- Socioeconomics
- Cultural Resources
- Transportation
- Airspace/Airfield Operations
- Pollution Prevention
- Environmental Justice

1.5 DECISION(S) THAT MUST BE MADE

The decision to be made will include selecting one of the alternatives described as follows:

Proposed Action: This alternative consists of interior renovations to the Former Steam Plant (Building 45) to convert the building to administrative space. In addition to the interior renovations, the project would include removal of the containment dike for a former AST and exterior improvements to prepare the facility for use as administrative space.

No-Action Alternative: Renovations to the Former Steam Plant would not occur and there would continue to be a shortage of administrative space at Scott AFB.

Upon review of this document, the 375th Airlift Wing Environmental Protection Committee (EPC) Chairperson at Scott AFB will decide which alternative to implement.

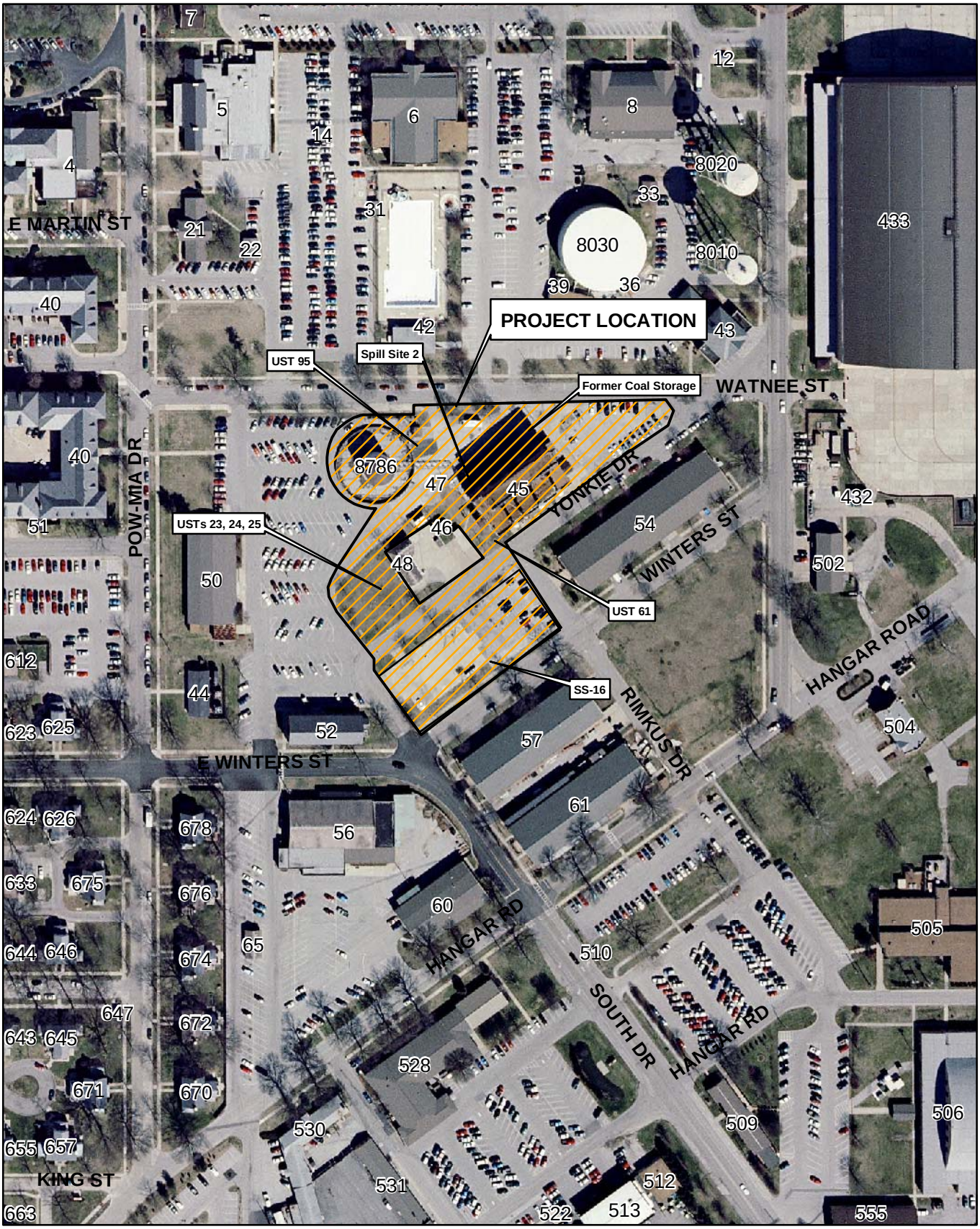

Figure 1-1 Site Location	Former Steam Plant Scott Air Force Base		0 50 100 200 Feet N W E S	OVERVIEW MAP

1.6 APPLICABLE REGULATORY REQUIREMENTS AND REQUIRED COORDINATION

Following is a list of Air Force Instructions (AFI), Executive Orders (EO), Acts, Air Force Manuals (AFMAN), Engineer Manual (EM), Code of Federal Regulations (CFR), Department of Defense Instructions (DoDI), and Technical Orders (TO) that are applicable to the Proposed Action.

- *National Environmental Policy Act*, Public Law 91-190, 42 United States Code (USC) 4321-4347, January 1, 1970;
- Council on Environmental Quality (CEQ) regulations, 40 CFR parts 1500 through 1505;
- EO 11988 and 11990, Floodplain Management and Protection of Wetlands;
- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations;
- *Clean Air Act* (1970, Amended 1990);
- Corps of Engineers Manual, EM 385-1-1, General Safety Requirements;
- 32 CFR, Part 989, Environmental Impact Analysis Process;
- AFI 32-7062, Air Force Comprehensive Planning;
- AFI 32-7064, Natural Resources Management;
- AFI 32-7065, Cultural Resources Management;
- DoDI 4165.57 and AFI 32-7063, Air Installation Compatible Use Zone (AICUZ) Programs;
- 29 CFR, Occupational Safety and Health Standards;
- AFMAN 32-1123, Unified Facilities Guide;
- AFH 32-1084 Civil Engineer Facility Requirements;
- 40 CFR 93.153, Air Conformity Determination;
- *Resource Conservation Recovery Act* (RCRA) 1970.

In addition to this list, coordination with regulatory agencies is discussed below.

The State Historic Preservation Office (SHPO) must be notified when alterations occur to historical buildings. Building 45 is listed on the National Register of Historic Places (NRHP) as a historical building and SHPO was notified of the Proposed Action. Relevant correspondence is included in Appendix C.

Various permits would be required for activities such as construction or extensions of sanitary/storm sewers and water mains, and other related activities. In addition to the aforementioned requirements and prior to construction, a Digging Permit, Air Force Form 103, (Base Civil Engineering Work Clearance Request) is required under AFI 32-1031 and Illinois Underground Utility Facilities Damage Prevention Act, Public Act 86-0674, amended 88-0681 and AFI 32-1031. This section is not all-inclusive, as environmental regulations and standards are frequently modified.

During implementation of one of the construction alternatives, the 375th Civil Engineering Squadron/Civil Environmental Flight (CES/CEV) (Environmental Management Flight [EMF]) would be notified immediately if an action or activity were observed that could adversely affect human health and/or the environment. This organization would take immediate action to correct the condition or contact IEPA for further guidance, if necessary. Best management practices are encouraged throughout the construction process.

2.0 DESCRIPTION OF THE ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1 INTRODUCTION

This section describes the selection criteria for alternative sites, details of the Proposed Action and No-Action, and past and reasonably foreseeable future actions relevant to cumulative impacts.

2.2 SELECTION CRITERIA FOR ALTERNATIVES

1) Minimum impact to the environment
2) Proposed Action needs to provide adequate administrative space
3) Proposed Action needs to provide adequate parking spaces
4) Complies with AT/FP standards
5) Location must meet long-term development plans
6) Location must meet the Base General Plan (BGP) provisions

Alternatives considered for this EA include the Proposed Action and the No-Action Alternative. Additional alternative sites at Scott AFB were considered and eliminated due to the alternatives failure to meet the selection criteria (see Section 2.3).

The Proposed Action was selected based upon the ability to meet the selection criteria listed above. The action is compatible with the October 2004 BGP for the Historic District. The BGP provides an illustration of Scott AFB's present and future capability to support its mission. The BGP is a stand-alone document prepared to respond to the Air Force's commitments to planning for future development and protecting the environment, as prescribed in the AFI 32-7062, *Air Force Comprehensive Planning*. The alternative sites considered but eliminated did not meet the above criteria for this type of project.

2.3 ALTERNATIVE SITES CONSIDERED BUT ELIMINATED FROM DETAILED STUDY

2.3.1 Preliminary Alternatives

Two additional alternatives were evaluated in the initial design stage of the project. These included leasing off-base property or installing temporary trailers at Scott AFB. Leasing off-base property was determined to be unsuitable for use as swing space for several reasons. These include disruption to mission capabilities, difficulties with resolving anti-terrorism/force protection (AT/FP) issues, and the long-term cost of a lease.

Mission disruptions created by leasing swing space off-base would include placing base personnel at a further distance from other base personnel or services that are required to complete their mission. Depending on the units involved this would lead to major inconveniences or, in the worse case, the inability to carry out the mission.

AT/FP standards for buildings occupied by Department of Defense (DoD) personnel are listed in Unified Facilities Code (UFC 4-010-01) DoD Minimum Antiterrorism Standards for Buildings. As of October 2005 these standards will apply to any new leases of buildings by DoD personnel in which DoD personal lease a minimum of 25% of the net interior usable space (reference UFC 4-010-01 for complete regulations). The requirements of new lease standards are anticipated to limit the number of suitable properties available for use by Air Force personnel and may increase the overall lease cost.

While cost alone is not sufficient reason to eliminate an alternative, it is worth noting that in the long-term the cumulative cost of the lease exceeds the renovation costs of the Proposed Action. Based on a preliminary economic analyses conducted by base planning personnel the long-term cost to lease the equivalent square feet of office space represented by the Proposed Action would exceed the renovation cost of the project.

The installation of temporary trailers was eliminated from further analysis for two main reasons. AFI 32-1021 (6.2.5) discourages the use of temporary trailers past three years. Therefore the use of these trailers does not represent a long-term solution to the shortage of administrative space. Scott AFB currently has two large (44,000 SF total) trailer units on base and these trailers require continual permits and maintenance.

Due to the lack of vacant space at Scott AFB the installation of trailers sufficient to house 80 personnel would need to displace some other service or function. These trailers require a stable surface for installation and are typically installed on parking lots. Installation on parking lots would eliminate needed parking spaces wherever these trailers were installed. In the absence of suitable parking areas gravel pads may be constructed. Vacant space suitable for construction of gravel pads is also limited. In addition, there are few locations on base where temporary trailers are compatible with the designated land use and visual setting.

2.3.2 Alternative Site Layouts

Various site layouts for parking lots were considered, but options were limited due to AT/FP issues and the lack of suitable vacant space. For example, the triangle of land bounded by Yonkie Drive and Watnee Street is currently functioning as a parking lot. Once Building 45 is renovated, this parking lot would exceed the minimum 25-meter (82 feet) stand off for an inhabited building. For this reason the concrete parking lot will be removed and replaced with turf grass. All of the remaining vacant areas in the vicinity of Building 45 of suitable size to function as parking lots are also Installation Restoration Program (IRP) sites. For example, the mowed field to the west of Building 48 contained three underground storage tanks and is currently undergoing evaluation to determine the extent of contamination. In addition, this site is located farther away from Building 45 than the area formerly occupied by the AST.

2.4 DESCRIPTION OF PROPOSED ALTERNATIVES

2.4.1 Proposed Action

This alternative consists of interior renovations to the Former Steam Plant (Bldg 45) to convert the building to administrative space. The sub-floor slab of the Former Steam Plant would be

removed and the existing steam pits bored for drainage. The first floor of the building would be completely restored with new plumbing, electrical, mechanical, and fire protection services. The interior walls would be built with pre-fabricated walls and would be reusable for future projects. The first floor would include conference rooms, open office space, private offices, break room, restrooms, mechanical rooms, janitor's closet, storage closets, and communication infrastructure rooms. Systems furniture would be utilized for the interior space to allow for maximum flexibility in adapting to each new occupant for the swing space.

A limited number of exterior improvements to Building 45 are also proposed. Exterior renovations would be limited to the extent required to the seal the exterior of the building from the elements and create a covered entry to the existing parking area. These improvements would comply with standards for renovating historical buildings. Two additional parking areas would be created to accommodate the increase in personnel. The first parking area would be located west of the Former Steam Plant in the area formerly occupied by the 420,000 gallon fuel oil AST and the associated containment dike. The containment dike and a limited amount of soil would be removed as part of the Proposed Action. The second parking lot would be constructed on the lot bounded by Yonkie Drive, Rimkus Drive, and Winters Street and is the site of the former vehicle maintenance shop (Building 53).

2.4.2 No-Action Alternative

The Former Steam Plant would remain as is and Scott AFB would continue to lack adequate swing space. Under current conditions Building 45 is completely uninhabitable. Building 45 is a historic structure listed on the NRHP and can not be readily demolished. Without renovation the building is vacant space that occupies a prime location.

2.5 DESCRIPTION OF PAST AND REASONABLY FORESEEABLE FUTURE ACTIONS RELEVANT TO CUMULATIVE IMPACTS

The location of the Proposed Action is in a portion of Scott AFB that is considered to be an improved area that is highly disturbed. The current base plan (375 CES, 2004) indicates several potential projects in the vicinity of the Proposed Action (see Section 3.16). None of these projects are anticipated to have significant cumulative impacts.

2.6 IDENTIFICATION OF PREFERRED ALTERNATIVE

The preferred alternative, referred to as the Proposed Action, includes renovating the Former Steam Plant located at Rimkus and Yonkie Drives.

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3.0 AFFECTED ENVIRONMENT

3.1 INTRODUCTION

This section describes the environmental components that could be affected by the implementation of the Proposed Action and the No-Action Alternative. Section 3.0 serves as a baseline for evaluating the environmental status of the Proposed Action and the No-Action Alternative. Additionally, this EA addresses the following environmental issues:

- Air Quality;
- Noise;
- Wastes, Hazardous Materials, and Stored Fuels;
- Water Resources, to include Floodplains and Wetlands;
- Biological Resources;
- Socioeconomic Resources;
- Cultural Resources;
- Land Use;
- Transportation Systems;
- Airspace/Airfield Operations;
- Safety and Occupational Health;
- Environmental Management, Pollution Prevention;
- Geology and Soils;
- Environmental Justice; and
- Indirect and Cumulative Impacts.

The aforementioned issues are not listed in order of significance.

3.2 AIR QUALITY

The Federal *Clean Air Act* (CAA) of 1970 required the adoption of air quality standards. These were established to protect public health, safety and welfare from known or anticipated effects of sulfur dioxide (SO_2), particulates ($PM_{2.5}$ and PM_{10}), carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (0_3), and lead (Pb).

The CAA requires all states to submit to the United States Environmental Protection Agency (EPA) a list identifying those air quality control regions, or portions thereof, which meet or exceed the National Ambient Air Quality Standards (NAAQS) or cannot be classified because of insufficient monitoring data. Portions of air quality control regions that are shown, by monitored data or air quality modeling, to exceed the NAAQS for any criteria pollutant are designated "non-attainment" areas for that pollutant. Section 176(c) of the Clean Air Act Amendments of 1990, 42 USC, Section 7506(c), establishes a conformity requirement for federal agencies which has been implemented by regulation 40 CFR Part 93, Subpart B.

Scott AFB occurs within the Metropolitan St. Louis Interstate Air Quality Control Region (AQCR #070). The state air quality-monitoring site closest to Scott AFB is the East St. Louis monitoring station, located in St. Clair County approximately 18 miles west of the base. Table

3-1 compares the applicable federal ambient air quality standards with the East St. Louis monitoring site maximum pollutant concentrations for the 3-year period 2002-2004 (U.S. EPA 2005).

Table 3-1. Comparison of Air Quality Measurements in St. Clair County (East St. Louis Station) with Federal Standards

		Federal Ambient Air Quality Standards (ppm)[1]	Maximum Concentration (ppm)[1]		
Pollutant	**Averaging Period**	**Primary**	**2002**	**2003**	**2004**
Carbon monoxide	**1 hour**	35	3.5	4.4	3.4
	8-hour	9	2.8	3.2	2.2
Nitrogen oxide	**Annual**	0.053	0.017	0.016	0.016
Particulate Matter (PM_{10})	**24-hour**	150 μ/m^3	107 μ/m^3	70 μ/m^3	54 μ/m^3
	Annual	50 μ/m^3	30 μ/m^3	34 μ/m^3	29 μ/m^3
Particulate Matter ($PM_{2.5}$)[2]	**24-hour**	65 μ/m^3	89 μ/m^3	51 μ/m^3	35 μ/m^3
	Annual	15.0 μ/m^3	16.7 μ/m^3	14.9 μ/m^3	14.7 μ/m^3
Lead	**Quarterly mean**	1.5 μ/m^3	0.04 μ/m^3	0.06 μ/m^3	0.05 μ/m^3
Sulfur dioxide	**3-hour**	0.5	0.190	0.168	0.124
	24 hour	0.14	0.056	0.049	0.039
	Annual	0.030	0.006	0.005	0.004
Ozone[3]	**1-hour**	0.120	0.117	0.134	0.102
	8-hour	0.080	0.103	0.111	0.078

[1]Unless otherwise stated

[2]There was one exceedance in 2002 with no exceedances in 2003 and 2004.

[3]For the 1-hour standard there were no exceedances in 2002 and 2004 and two exceedances in 2003 from this monitor. For the 8-hour standard, there were nine exceedances in 2002, three exceedances in 2003, and no exceedences in 2004 from this monitor.

This AQCR is designated as a moderate non-attainment area for ozone and $PM_{2.5}$, a limited maintenance area for carbon monoxide, and either as attainment or no designation for the remaining pollutants.

3.2.1 Emissions Inventory

This section presents information on air pollutant emissions from activities at Scott AFB. The Scott AFB emissions are also compared with ozone-producing pollutant emissions from the Illinois portion of the St. Louis Standard Metropolitan Statistical Area (SMSA) of AQCR #070. The St. Louis SMSA emission inventory accounts for emission sources in St. Clair County, as well as emission sources from four other counties.

Table 3-2 summarizes annual emissions at Scott AFB by source category for calendar year 1998. This table was developed from an emission inventory compiled by Scott AFB (Laura Dods, pers. comm., 2004). Emissions, reported in tons per year, are organized into 18 categories: external

combustion services, stationary internal combustion engines, medical waste incineration, storage tanks, fuel transfers, equipment leaks, spray painting booths, solvent parts washers, miscellaneous product usage, fire fighter training, fuel cell maintenance, landfills, non-destructive inspection, ordnance detonation, pesticide application, small arms range, wet cooling towers, and woodworking.

Table 3-2. Air Pollutant Emissions Inventory for Scott AFB in 1998 (tons/year)

Source Category	Carbon Monoxide	Nitrogen Oxides	Particulate Matter	Sulfur Oxides	Volatile Organic Compounds
External Combustion Sources	2.24	2.82	0.216	0.017	0.156
Stationary Internal Combustion Engines	1.12	4.98	0.186	0.154	0.210
Medical Waste Incineration	0.100	0.120	0.103	0.073	0.010
Storage Tanks	--	--	--	--	3.32
Fuel Transfers	--	--	--	--	6.52
Equipment Leaks	--	--	0.003	--	0.134
Spray Painting Booths	--	--	--	--	0.232
Solvent Parts Washers	--	--	--	--	0.262
Miscellaneous Product Usage	--	--	--	--	0.374
Fire Fighter Training	0.031	0.112	0.019	--	0.048
Fuel Cell Maintenance	--	--	--	--	0.013
Landfills	0.147	--	--	--	1.90
Non-Destructive Inspection	--	--	--	--	<0.001
Ordnance Detonation	<0.001	<0.001	<0.001	--	<0.001
Pesticide Application	--	--	--	--	0.116
Small Arms Range	0.010	--	--	--	--
Wet Cooling Towers	--	--	0.449	--	--
Woodworking	--	--	0.770	--	--

3.3 NOISE

Department of Defense Instruction 4165 establishes and requires military departments to develop, implement, and maintain an Air Installation Compatible Use Zone (AICUZ) program for installations with flying operations. AFI 32-7063, AICUZ Program sets forth the policy, responsibilities, and requirements of the program. Topics covered include program objectives, responsibilities, land use compatibility guidelines, and AICUZ studies and updating. This program is designed to provide information on flight operations and compatibility guidelines to local planners to help them mitigate the noise impacts of military aircraft operations. The AICUZ program uses information on aircraft types, flight patterns, power settings, numbers of operations, and time of day or night to estimate average busy-day noise levels. This estimation is accomplished by using the NOISEMAP computer model and the results are expressed in terms of the day-night average sound level. The latest AICUZ was completed in February 2001. Noise level contours based on the computer noise model NOISEMAP indicate the noise levels at the location of the proposed parking lot to be less than 65 decibels (dB) (Figure 3-1). Air Force

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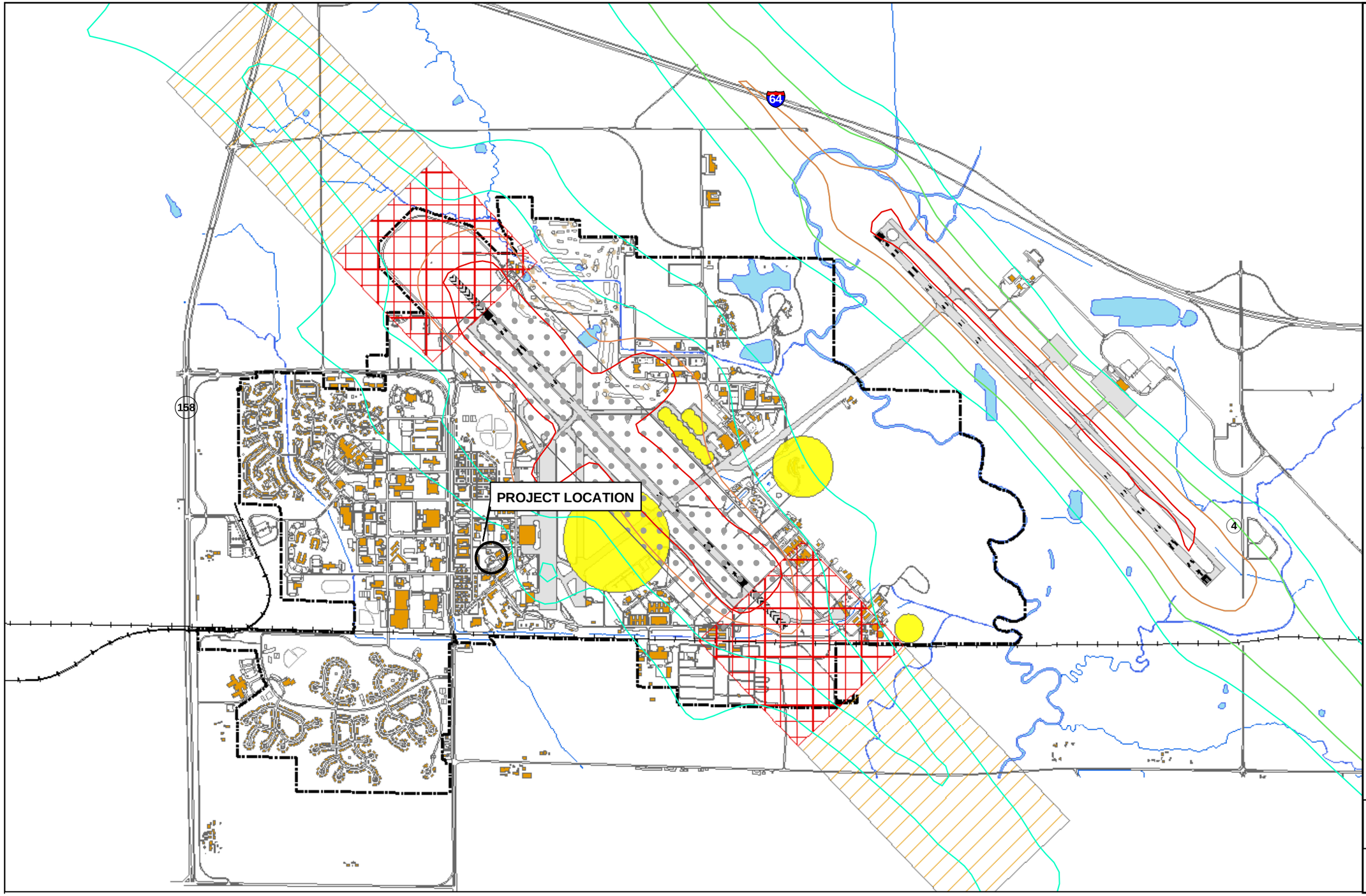
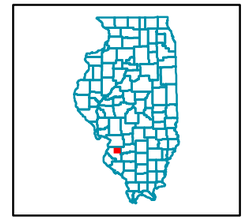


OVERVIEW MAP



LEGEND

- BASE BOUNDARY
- AIRFIELD SURFACE
- BUILDINGS
- QD AREA
- APZ 1
- CLEAR ZONE
- PRIMARY SURFACE
- SURFACE WATER
- STREAM
- RAILROADS

NOISE CONTOURS

- 65 dB
- 70 dB
- 75 dB
- 80 dB

1,000 500 0 1,000 Feet

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Former Steam Plant
Scott Air Force Base

Figure 3-1.
Operational Constraints

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AICUZ guidelines recommend restrictions for land use at varying noise levels. No land use restrictions exist at noise level zones below 65 dB.

Noise standards are also addressed in Occupational Safety and Health Administration (OSHA) standards and implemented by regulation 29 CFR 1910.95. The Department of Labor administers these regulations, which are applicable at construction sites and buildings at Scott AFB. Ambient noise sources in the vicinity of the location of the Proposed Action include aircraft from the flightline and normal vehicular traffic on the streets surrounding the site of the Proposed Action.

3.4 WASTES, HAZARDOUS MATERIALS, AND STORED FUELS

The *Resource Conservation and Recovery Act* established statutory requirements that serve as the basis of the hazardous waste regulations. These regulations are found at 40 CFR 260-279. Corresponding state regulations identifying and listing hazardous wastes and standards applicable to generators of hazardous wastes are found at 35 Illinois Administrative Code 721-722. Hazardous chemicals and materials are defined in 29 CFR 1900.1200. Legal requirements regarding emergency planning and reporting of hazardous and toxic chemicals are noted in the *Emergency Planning and Community Right to Know Act* (EPCRA).

3.4.1 Installation Restoration Program

Executive Order 12580, adopted in 1987, gave various federal agencies, including the Department of Defense (DoD), the responsibility to act as lead agencies for conducting investigations and implementing remediation efforts when they are the sole or co-contributor to contamination on or off their properties. To ensure compliance with CERCLA, its regulations, and Executive Order 12580, the DoD developed the IRP, under the Defense Environmental Restoration Program, to identify potentially contaminated sites, investigate these sites, and evaluate and select remedial actions accordingly.

A review of IRP records indicated that four IRP/ Area of Concern (AOC) sites are located on the subject property. These include the Coal Storage Piles (AOC 18), underground storage tank (UST) 95 leak site (ST-10), Spill Site No. 2 (AOC 10), and the former Vehicle Maintenance Facility (SS-16). UST 61 was also formerly located in the vicinity of Building 45. Two IRP/AOC site are listed as occurring within 100 feet of the subject site. These include the Former Aqua Yard (SS-11) and Building 48 (USTs 22, 23, 24). Locations and descriptions of these sites are below.

Former Steam Plant (Building 45) Site

AOC 18 Coal Storage Piles

A preliminary assessment has been conducted for known locations of coal storage piles at Scott AFB. One such site was located near the northeast corner of Building 45. A site survey and soil boring were conducted at this site. No remnants of coal storage were encountered at the ground surface or within the subsurface soil at the Former Steam Plant (SAIC, 2005a).

ST- 10 UST 95 Spill Site
Tank 95 was a 2,000-gallon UST used to store waste oil from an oil/water separator. The tank was installed adjacent to Building 49 and removed on April 22, 1993. Approximately 70 cubic yards of soil were reportedly removed from the site, treated, and used as backfill. *The Phase II Remedial Investigation – Site ST-10* concluded that the UST 95 site presents minimal threat to human health and environment (HydroGeologic, Inc, 2004).

AOC 10 – Spill Site No. 2
This site is located west of Building 45 at the corner of Yonkie and Rimkus Drive. Approximately 1,500-gallons of fuel oil were released from a ruptured steam heating coil that serviced the 420,000-gallon AST. The spill occurred in 1978 and no further investigation has occurred.

UST 61
This site was a 500-gallon diesel fuel UST that was installed in 1985 and removed in 1993. Residual contamination levels were well below clean up levels instituted by the IEPA. A Corrective Action Completion Report will be prepared for this site and submitted to the IEPA for approval of closure of the site.

Proposed Parking Lot (former location of Building 53)
SS-16 was previously used as a vehicle maintenance facility (Building 53) for Scott AFB. From 1942 to 1947 the facility operated as the Transportation Building and the facility was used to service and maintain ground vehicles. The Transportation Building operations were moved in 1987 and from 1987 to 1997 Building 53 was used as part of the "Self Help Storage" operations. Building 53 was demolished in 1998 and the site currently consists of a concrete foundation and parking area. While Building 53 was in service the site contained three hydraulic lifts and an oil/water separator. All the equipment for the lifts has been removed and the pits were filled in with soil, gravel and debris from the building demolition. The oil/water separator was left in place and has reportedly been serviced once since the building was demolished. An initial investigation of the site has been completed (Tetra Tech, Inc., 2003) and the site is scheduled for remediation in FY 2010.

Adjacent Sites

Building 48 USTs 23, 24, and 25
Building 48 USTs 23, 24, and 25 were formerly present at a gasoline station at Scott AFB. USTs 23 and 24 were 12,000-gallon diesel fuel tanks installed on January 1, 1956. Both tanks were made of single walled coated steel without tank corrosion protection. UST 25 was an 11,000 gallon unleaded gasoline tank. UST 25 was installed on January 1, 1979 and was made of fiberglass with tank corrosion protection. All three tanks were excavated, transported, and disposed by OHM Remediation Services Corp. in 1998. The tanks were shipped off-site as scrap metal. Associated piping and ancillary equipment was removed from the trenches, cut into manageable lengths and stored on the decontamination pad for cleaning and disposal as well.

Existing site structures include Building 48, two pump islands, one active and one inactive fuel dispenser, one AST, two storage buildings, and a large compressor. An electrical vault is present

near the southwest corner of the site. An initial investigation of this site is currently scheduled for FY2006.

SS-Aqua Yard
The Former Aqua Yard is located approximately 150 feet northwest of the existing Building 504. This site is a RCRA site and may have elevated levels of arsenic and manganese in the groundwater (T N & Associates, 2005).

3.4.2 Asbestos and Lead Based Paint

Originally constructed in 1940, the Former Steam Plant provided a central steam heating facility for Scott AFB until it was decommissioned in 1997. Site investigations conducted after the plant was decommissioned indicated the presence of lead based paint (LBP) and asbestos-containing materials (ACM). A project was initiated in September 2003 to remediate lead and asbestos issues within the building and to remove all the components of the Former Steam Plant (boilers, coal bins, piping, etc.). The project was completed in 2004 and all of the accessible ACM was removed. LBP was removed to the degree that was feasible and any remaining LBP that was not removed from the building was encapsulated. The encapsulant has since begun to flake and additional LBP removal will be required.

3.5 WATER RESOURCES

3.5.1 Surface Water Resources

Scott AFB is located within the Lower Kaskaskia Watershed in St. Clair County. The primary streams located within Scott AFB include Ash and Silver Creek. Ash Creek originates approximately one mile northwest of the base near Shiloh, Illinois. From its origin, Ash Creek flows through the base and abuts the rear of the old commissary before discharging into Silver Creek. Silver Creek forms the western boundary of Scott AFB. The creek has steep mud banks, low stream gradient, and turbid water. The drainage area of Silver Creek, which encompasses approximately 395 square miles upstream of Scott AFB, consists primarily of farmland. Scott AFB is also drained by overland flow to diversion structures, field tiles, storm sewers, drainage ditches, and culverts. About 60 percent of the base is drained by Silver Creek and the remaining area is drained by Ash Creek (Woolpert, 2002).

3.5.2 Floodplains

Executive Order 11988 dated May 24, 1977; entitled “Floodplain Management” defines a floodplain and establishes a policy of avoiding impacts to floodplains when practicable. Facility design and construction, real property acquisition, maintenance activities, real property disposal, and natural resource program implementation actions must comply with EO 11988. The basis for this guidance includes the *Clean Water Act* of 1977, 33 USC 1251 et seq., *National Environmental Policy Act of 1969*, (NEPA), 42 USC 4321. et. seq., the *National Flood Insurance Act of 1968*, 42 USC 4001, et seq., the *Flood Disaster Protection Act of 1973*, and Public Law 93-235, 87 Statute 975. Floodplains at Scott AFB are generally located adjacent to Silver Creek near the eastern boundary of the base (Figure 3-2). The base is currently revising the floodplain

and wetland map of Scott AFB. The planned revision of the floodplain map is not anticipated to change the floodplain status in the vicinity of the Proposed Action.

3.5.3 Groundwater Resources

Scott AFB is situated in an area of southwestern Illinois that lacks aquifers of regional significance.

The significant hydrogeologic units present in the area include alluvium containing sand and gravel lenses, sand and gravel layers within the glacial deposits, and sandstone or other permeable strata within the bedrock. Water quality varies greatly, with water from the surficial deposits usually of slightly better quality than water from the bedrock units. Precipitation is the primary source of groundwater recharge in the area. Groundwater flow in the vicinity of the project is generally to the south and west.

3.5.4 Water Use and Treatment

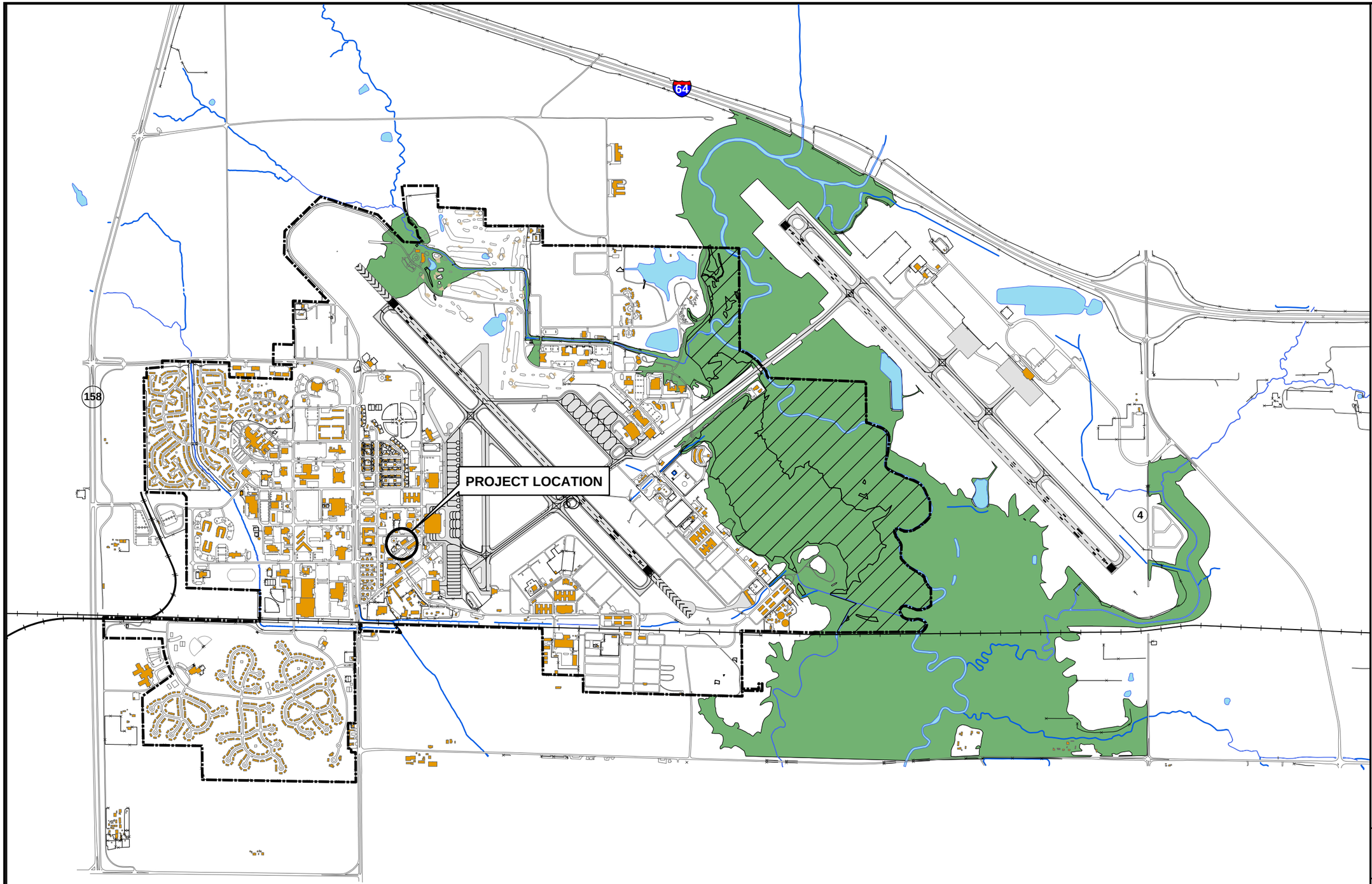
The *Clean Water Act* regulates water quality. These regulations are found at 40 CFR, Subchapter D. Scott AFB is situated in an area of southwestern Illinois that lacks aquifers of regional significance. Precipitation is the primary source of groundwater recharge in the project area. Most communities in St. Clair County, including Scott AFB and several communities in the Granite City area in Madison County, obtain their water from the Mississippi River through the Illinois-American Water Company. No drinking water wells are known to be in use within the boundaries of Scott AFB. However, domestic and agricultural users within 10 miles of the base obtain a limited amount of water from shallow aquifers.

An on-site sewage treatment plant serves Scott AFB with a capacity of two million gallons per day (mgd). The sewage flow averages about 1.45 mgd. The plant provides tertiary treatment, and the effluent is discharged to a tributary of Silver Creek at the southeast part of the base (Woolpert, 2002). Observations conducted as part of the *35% Design Analysis Renovate Old Steam Plant, Building 45* (Burns and McDonnell, 2004) indicated that storm water drainage in the vicinity of the Proposed Action is currently sufficient.

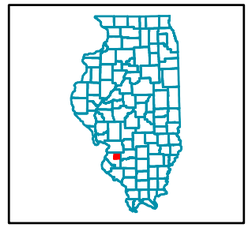
3.5.5 Wetlands

The *Clean Water Act*, noted earlier in this section, sets the basic structure that regulates discharges and dredged materials that could enter wetlands. There are many other laws and regulations, such as the *Federal Agriculture Improvement and Reform Act*, the *North American Wetlands Conservation Act*, and the *Endangered Species Act*, that are applicable to wetlands protection. By definition, wetlands are transitional lands between terrestrial and aquatic systems where the water table is usually at the surface or the land is covered by shallow water. Wetlands generally include swamps, marshes, bogs, and similar areas.

The largest area of wetlands at Scott AFB is located within the bottomland forest adjacent to Silver Creek (Figure 3-2). Other wetland resources located at Scott AFB include those located adjacent to Ash Creek and a number of ponds and depressional wetlands scattered throughout the base. There are no wetland located in the vicinity of the Proposed Action.



OVERVIEW MAP



LEGEND

- BASE BOUNDARY
- AIRFIELD SURFACE
- WETLAND
- BUILDINGS
- 100-YEAR FLOOD
- SURFACE WATER
- STREAM
- FENCE LINES
- RAILROADS

SCOTT AIR FORCE BASE, ILLINOIS

1,000 500 0 1,000
Feet

1 inch equals 2,000 feet

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Former Steam Plant
Scott Air Force Base

Figure 3-2.
Wetlands and Floodplains

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3.6 BIOLOGICAL RESOURCES

Air Force Instruction 32-7064, Integrated Natural Resources Management, and the *Endangered Species Act* address biological resources. No plants listed as endangered by the Illinois Endangered Species Protection Board were found at Scott AFB during botanical surveys conducted on September 19, 2001. Although no botanical endangered species were discovered, suitable habitat does exist for both state and federally listed species within the Scott AFB boundaries. No such habitat is located at the site of the Proposed Action.

A single federally endangered Indiana bat (*Myotis sadalis*) was captured during a study conducted by personnel from the U.S. Engineer Research and Development Center in July 2001. The Indiana bat was identified along Silver Creek near the confluence of Carolina Creek (USAERDC, 2002). Although suitable habitat for the Indiana bat is found at Scott AFB, none exists in the vicinity of the Proposed Action.

The only state endangered animal species identified at Scott AFB is the little blue heron. The presence of a little blue heron was incidentally noted during the 2001 bird survey. The little blue heron is not present at the site of the Proposed Action, nor does any suitable habitat for the little blue heron exist at the site.

Biological resources at the site of the Proposed Action are limited to areas of maintained lawn with ornamental plantings.

3.7 SOCIOECONOMIC RESOURCES

The Location and Region of Influence (ROI) for the Proposed Action is Scott AFB, located in St. Clair County, Illinois, approximately 20 miles east of the City of St. Louis, Missouri. The base covers approximately 3,600 acres and is located in a predominantly agricultural area. The base is immediately south of Interstate Highway 64 (Figure 1-1), near the cities of O'Fallon and Belleville. The socioeconomic ROI for an analysis of this type is generally defined by the residence patterns of current installation personnel, the number of personnel associated with the action under consideration, and the value of any construction associated with the action. Construction firms and workers are expected to originate from O'Fallon, Illinois or other regions surrounding Scott AFB.

The population of St. Clair County in 2000 was 256,599 (U.S. Census Bureau, 2000). There are approximately 14,248 persons employed by Scott AFB (Table 3-3). In addition, the base supports approximately 17,020 retiree personnel. The total Scott AFB community, on- and off-base, comprises approximately 39,952 military and civilian personnel and their families. Table 3-3 contains a breakdown of base personnel.

Table 3-3. Base Population

Personnel	Population
Active Duty Military	6,850
Air Force Reserve	1,138
Air National Guard	854
Civilians	5,416
Total Work Force	**14,258**
Family Members (Dependants)	8,314
Retired Military	17,020
Total Population	**39,592**

Source: Scott AFB, 2005

3.8 CULTURAL RESOURCES

Historical and cultural resources are protected under the *National Historic Preservation Act* (16 USC 470a-470w), EO 11593, *Protection and Enhancement of the Cultural Environment*, the *Archaeological and Historic Preservation Act* (16 USC 469-469c), the *Historic Sites Act* (16 USC 461-467), and the *Illinois State Agency Historic Resources Preservation Act*. Federal agencies must provide an opportunity for comment and consultation with the Illinois Historic Preservation Agency and the Advisory Council on Historic Preservation when an action has the potential to affect historic or cultural sites. AFI 32-7065, Cultural Resources Management, must be complied with as well.

The National Park Service conducted an evaluation of historic building at Scott AFB in 1992 (Thomason, 1992) and concluded that Building 45 was eligible for listing on the NRHP. Building 45 is part of the historic district (Figure 3-3) at Scott AFB and is considered a contributing building to the historic integrity of the district.

The National Park Service conducted an archeological assessment of Scott AFB in 1992. Archeological potential for the site of the Proposed Action is identified as being "highly disturbed" (Figure 3-3) and as having "an extremely low potential for the identification of additional cultural resources."

3.9 LAND USE

Originally, the land in the vicinity of Scott AFB was vegetated by tall grass prairie and mixed hardwood forest. Before the government acquired it, the primary land use was agriculture. Since that time, land management has included construction sites, residential and commercial use and permanent mowed turf grass (INRMP, 2002). Land cover at the site of the Proposed Action consists of mowed turf grass with broken concrete and asphalt and ornamental plantings. The foundation for a former AST and the remnants of concrete containment dike are located in the vicinity of Building 45. The foundation of Building 53 is present on the block of land located south of Building 45. The BGP classified land use in the vicinity of the Proposed Action as administration, industrial, and open space (Figure 3-4). Land use immediately adjacent to the Proposed Action includes the following:

North - Watnee Street, Pool House (Building 42)
East - Buildings 45 and 54
South - Buildings 56 and 57
West - Parking, Building 50

3.10 TRANSPORTATION SYSTEMS

The Proposed Action is bounded by Watnee Street to the north and Winters Street to the south. Yonkie and Rimkus Drive are also located in the vicinity of the project area. South Drive is the largest arterial road located in the vicinity of the project. South Drive intersects Yonkie Drive and Winters Street in the southwest corner of the project site.

3.11 AIRSPACE/AIRFIELD OPERATIONS

Based upon the Operational Constraints map included in the BGP (Figure 3-1), the construction areas involved with the Proposed Action are not located in a clear zone or an accident potential zone. UFC 3-260-01 (formerly AFI 32-1123) states that to meet specific airspace/airfield operations criteria, construction must be more than 1,000 feet from the runway centerline, and constructed structures should be under a 7:1 ratio from the 1,000-foot line. The UFC also states that new facilities must be constructed at least 125 feet from the edge of all existing aircraft parking aprons to meet the apron clearance criteria specified in
UFC 3-260-01. The site of the Proposed Action complies with these standards.

3.12 SAFETY AND OCCUPATIONAL HEALTH

Factors involving primary occupational safety and health issues are addressed in 29 CFR Occupational Safety and Health Standards. The Department of Labor administers these regulations, which are applicable at construction sites and buildings at Scott AFB. If the Proposed Action is implemented, all applicable provisions of the Corps of Engineers Manual EM 385-1-1, "General Safety Requirements," must be followed. As was discussed in Section 3.4 the site of the Proposed Action contains both IRP and AOC sites. EM 385-1-1 Section 6 details worker protections, safety requirements, and the appropriate sources for determining exposure levels if hazardous materials are encountered during the construction process.

Unified Facilities Criteria 4-010-01 presents guidelines for AT/FP at military installations. These guidelines include such topics as access to facilities, facility siting, exterior design, interior design, and landscaping. In the event of a terrorist attack, the intent of this guidance is to improve security, minimize fatalities, and limit damage to facilities. All feasible AT/FP standards would be implemented during the design of the Proposed Action.

3.13 ENVIRONMENTAL MANAGEMENT – POLLUTION PREVENTION

The United States Air Force (USAF) recognizes the importance of pollution prevention (P2) in protecting the environment, achieving compliance objectives, and reducing waste disposal costs. Such successful P2 programs as recycling, waste minimization, product substitution, and process changes, among others, are planned or underway at Air Force installations worldwide.

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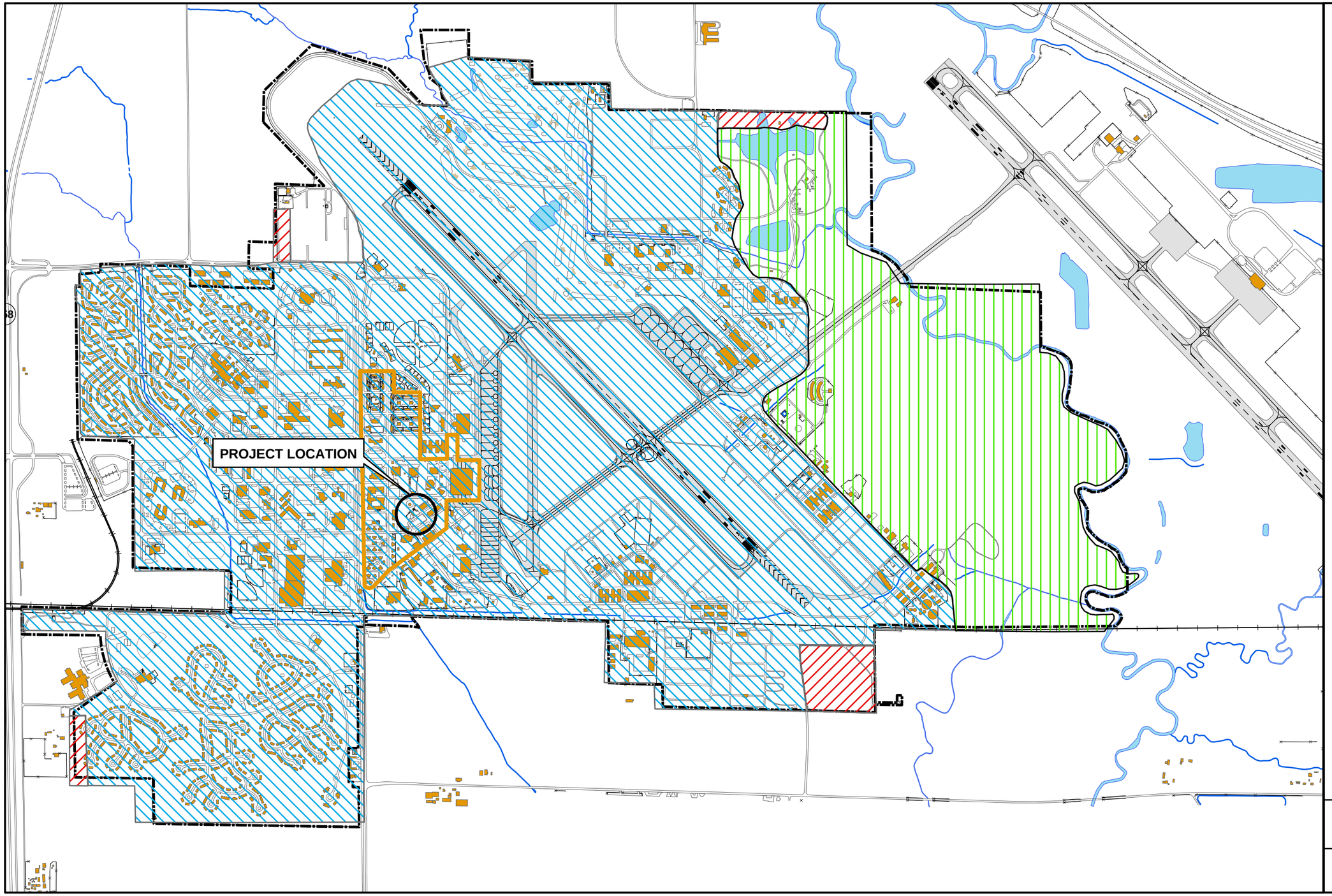
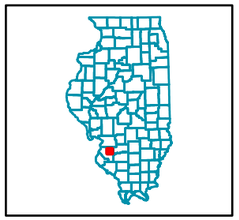


OVERVIEW MAP



LEGEND

- BASE BOUNDARY
- HISTORIC DISTRICT
- AIRFIELD SURFACE
- BUILDINGS
- SURFACE WATER
- STREAM
- RAILROADS
- FENCE LINES

ARCHAEOLOGICAL POTENTIAL

- LOW
- MODERATE
- HIGHLY DISTURBED AREA

SCOTT AIR FORCE BASE, ILLINOIS

1,000 500 0 1,000 Feet

1 inch equals 1,500 feet

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Former Steam Plant
Scott Air Force Base

Figure 3-3. Cultural Resources

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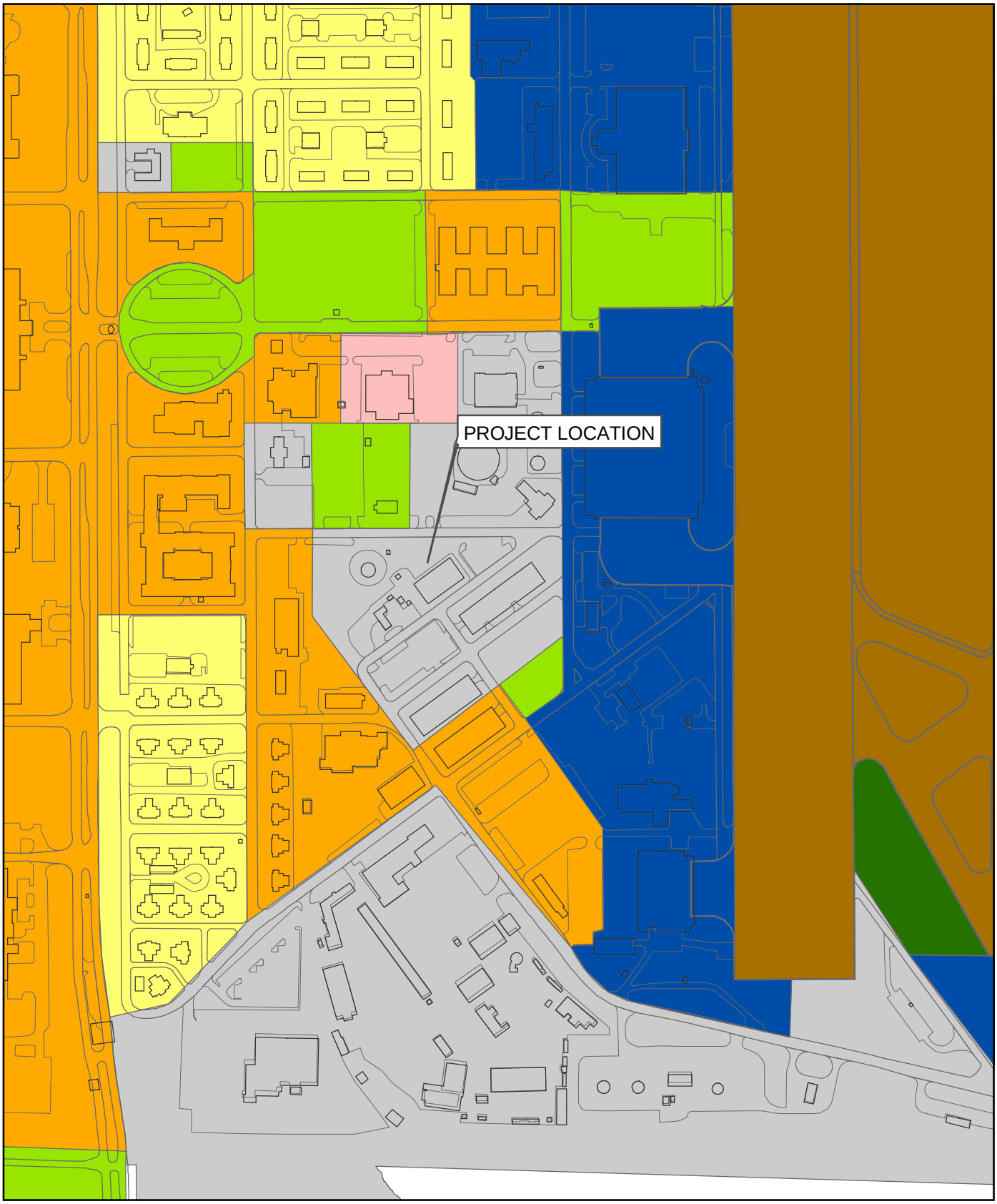

Legend

- Administration
- Aircraft Operations and Maintenance
- Airfield
- Community(Service)
- Housing (Accompanied)
- Industrial
- Open Space
- Outdoor Recreation

Figure 3-4.
Existing Land Use

Former Steam Plant
Scott Air Force Base

0 200 400 Feet

1 inch equals 400 feet

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OVERVIEW MAP

Most tenant activities at Scott AFB participate in the recycling program. If the Proposed Action were implemented, the selected contractor would participate as well. All ferrous and non-ferrous metals from the project must be recycled. The contractor would also recycle general administrative refuse associated with this project. This refuse may include cardboard, mark 1 and 2 plastic bottles, metals, glass, aluminum and steel cans, and mixed paper. All recyclable material must be turned into the Base Recycling Center located at Building 3286. Hours of operation are 0730 to 1500 Monday through Friday and 0730 to 1100 on Saturdays.

3.14 GEOLOGY AND SOILS

Pennsylvanian bedrock underlies Scott AFB at a depth of approximately 85 feet. Underlying the Pennsylvanian bedrock is the Chesterian Series sandstone. There are no geologic outcrops at Scott AFB. Soils in the vicinity of the Proposed Action are described as Muscoutah silt loam with a 0-3 percent slope (USDA, 2003). Soils at the site of the Proposed Action have been highly disturbed by previous development.

3.15 ENVIRONMENTAL JUSTICE

St. Clair County is a large, demographically diverse county, with communities ranging from urban areas of East St. Louis and Belleville to small rural towns east and west of Scott AFB. The year 2000 population of St. Clair County was approximately 67.9 percent Caucasian and 34.3 percent minorities, with the predominant minority described as African-American; 2.2 percent of the county's population is considered Hispanic (U.S. Census Bureau, 2000). There are no low-income or minority disadvantaged populations in the area of the Proposed Action.

3.16 INDIRECT AND CUMULATIVE IMPACTS

The location of the Proposed Action is in a portion of Scott AFB that is considered to be an improved area that is highly disturbed. The current base plan (375 CES, 2004) indicates several potential projects in the vicinity of the Proposed Action. Potential future development includes the following:

- Long-term renovations to Building 45 would include the construction of a second and third floor. These new floors would be utilized as administrative space.
- Potential remediation of UST 95 spill site
- Remediation of the former Building 53 IRP site (SS-16)
- IRP investigative activities adjacent to Building 48
- Relocation of Civil Engineering Complex
    - Demolish Existing CE Buildings
    - Construct Customer Service Complex
    - Construct Operations Group Head Quarters

Past activities within Building 45 have included the recent completion of an ACM and LBP remediation. This remediation involved the removal of all of the equipment in the interior of the Former Steam Plant.

Other possible cumulative impacts would include the construction of additional parking due to the requirements of future renovations to Building 45. It is also anticipated that the converstion of Building 45 to administrative space would facilitate the expansion of administrative space in the Historic District.

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4.0 ENVIRONMENTAL CONSEQUENCES

4.1 INTRODUCTION

Environmental consequences of the Proposed Action and the No-Action Alternative are addressed in this section. The Proposed Action would include the renovation of Building 45 and the construction of two parking lots. The No-Action Alternative includes taking no action to improve the existing lot, thereby remaining status quo.

The analysis process determines the consequences of each action and the anticipated impact(s) that the action could have, if implemented. The Proposed Action and the No-Action Alternative could generate no impact to environmental issues, or encompass environmental consequences that may fall into the categories described in Table 4-1.

Table 4-1. Description of Environmental Consequences

Word	Definition
Short-term	effects caused during the construction and/or initial operation of the action
Long-term	effects caused after the action has been completed and/or the action is in full and complete operation or effects of the action if not approved
Irreversible	those effects caused by the proposal that cannot be reversed
Irretrievable	effects caused by an alternative that change outputs or commodities (e.g. trees, cattle, hiking, fishing) of land's use *and* must be reversible
Positive	constructive, progressive effects
Negative	harmful, destructive, unsafe, risky
Minor	trivial, irrelevant, inconsequential
Major	vital, primary, important
Adverse	unfavorable, undesirable, harsh
Direct	caused by the action and occur at the same time and place
Indirect	caused by the action and effects occur later in time or farther removed in distance, but reasonably foreseeable
Cumulative	nonrelated actions that have, are, or probably would occur in the same locality

A **significant** impact, as it applies to NEPA, requires considerations of both context and intensity. The following descriptions are brief and do not cover all aspects of the terminology. Context means that the significance of an action must be analyzed in several arenas, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. Intensity refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. Impacts may be both beneficial and adverse. Intensity also includes the degree to which the Proposed Action and alternatives affect public health or safety. A summary table of the environmental resources that are determined to be impacted by the Proposed Action and the No-Action Alternative is provided in Section 4.18.

4.2 AIR QUALITY

4.2.1 Proposed Action

A conformity determination would not be required, as the total of direct and indirect emissions from construction activities at the site of the Proposed Action are below *de minimus* thresholds specified at 40 CFR 93.153(b)(1). Specifically stated, implementation of the Proposed Action would not increase emissions over baseline emission levels. The statutory requirements of conformity are included in the CAA, section 176(c) and require the EPA to publish regulations requiring federal actions to conform to applicable state or federal implementation plans (SIPs or FIPs) to ensure that the actions do not interfere with strategies employed to attain National Ambient Air Quality Standard. The EPA proposed conformity regulations entitled *Determining Conformity of General Federal Actions to State or Federal Implementation Plans*. These were brought into effect on January 31, 1994. The intent of the conformity ruling is to ensure that federal actions do not adversely affect the timely attainment and maintenance of air quality standards. Air Force personnel and installation planners are to analyze each Air Force action, in accordance with EPA regulation 40 CFR 93, to ensure conformity with the applicable SIP or FIP. The conformity analysis examines the impacts of the direct and indirect air emissions from a proposed Air Force action and determines whether the action conforms to the applicable SIP or FIP. The Proposed Action would be in compliance with, or consistent with, all relevant requirements and milestones contained in the Illinois SIP. Contractor(s) and subcontractor(s) of this project must comply with these regulations, including 42 USC 7418(a) (state and local requirements).

A **short-term minor** increase in emissions from equipment and vehicles would occur during the construction phase of the Proposed Action. Fugitive dust and particulate matter would be emitted into the air from access roads, stockpiles, and/or other work areas. These emissions would be temporary and would return to pre-construction levels once the parking lot was completed. Water sprinkling would be the preferred method of controlling fugitive dust, especially if a nuisance or road hazard due to fugitive dust particulate arises, or is anticipated due to windy or dry weather conditions.

4.2.2 No-Action Alternative

There would be **no impact** to air quality issues if this alternative were selected.

4.3 NOISE

4.3.1 Proposed Action

Implementation of the Proposed Action would generate **short-term, minor adverse impacts** throughout the construction phase of the project. The amount of noise generated from construction and operational activities would be negligible and temporary. Post-construction noise levels surrounding the parking lot would remain at or near pre-construction levels.

4.3.2 No-Action Alternative

There would be **no impact** from noise-related issues if this alternative were selected.

4.4 WASTES, HAZARDOUS MATERIALS AND STORED FUELS

4.4.1 Proposed Action

As was described in Section 3.4, several IRP and AOC sites are located in the vicinity of the Proposed Action. The only site that in which potentially contaminated soils are known to exist and are likely to be encountered due to excavation activities is the site of UST 95 and the soils surrounding this site. **No impacts** related to potential contamination are expected as long as workers follow the required Health and Safety Plan and Emergency Response Plan. These plans address the proper personal protective equipment (PPE) and necessary safety precautions required to minimize worker and public exposure to potential contamination. Any potentially contaminated soils encountered during excavation would be stockpiled on-site and disposed of in accordance with appropriate Scott AFB, State and Federal regulations. The Health and Safety Plan and Emergency Response Plan would also apply if contamination was uncovered at any of the other IRP or AOC sites. Potential impacts related to the other IRP/AOC sites are described below.

Former Steam Plant (Building 45) Site

AOC 18 Coal Storage Piles

A previous site survey at the reported location of the former coal storage pile near Building 45 indicated no evidence of a coal storage pile. Therefore, no coal contaminated soils are likely to be encountered at this location and **no impacts** would result from implementation of the Proposed Action. The removal of the existing gravel parking lot is planned for this area and should potentially contaminated soils be uncovered the Emergency Response Plan would be implemented and contaminated soils would be stockpiled and evaluated for proper disposal.

ST- 10 UST 95 Spill Site

The Phase II Remedial Investigation – Site ST-10 concluded that the UST 95 site presents minimal threat to human health and environment (HydroGeologic, Inc, 2004) and **no impacts** are anticipated from implementation of the Proposed Action. However the soils in this area are contaminated and would be treated in accordance with the Health and Safety Plan and Emergency Response Plan.

AOC 10 – Spill Site No. 2

This site is the location of a known spill; however, no excavations are planned for this location. Therefore, **no impacts** are anticipated due to the presence of this spill.

UST 61

Residual contamination levels at this site are well below clean up levels instituted by the IEPA. Therefore, **no impacts** resulting from this former UST are expected.

Proposed Parking Lot (former location of Building 53)

No excavations are planned at this location and the existing oil/water separator would be left undisturbed. A **potential short-term positive impact** may result from implementation of the Proposed Action. According to the Draft Feasibility Study for SS-16, one of the remediation options for the site is to build an engineered barrier (e.g. concrete cap) and create institutional

controls that would reduce the potential for exposure from contaminated soils. The positive impact is limited to the short-term because it is anticipated that with or without the Proposed Action, the site would eventually be remediated under the IRP.

Adjacent Sites

Building 48 USTs 23, 24, and 25
No impacts as a result of the Proposed Action are anticipated at the former location of USTs 23, 24, 25. No excavation would occur at this location and any potentially contaminated soils would be left undisturbed.

SS-Aqua Yard
The Former Aqua Yard is located approximately 150 feet northwest of the existing Building 504. This site is a RCRA site and may have elevated levels of arsenic and manganese in the groundwater (T N & Associates, 2005). Groundwater flow is away from the site of the Proposed Action and implementation of the Proposed Action would not disturb the site of the Former Aqua Yard. Therefore, **no impacts** are anticipated as a result of the Proposed Action.

Lead Based Paint and Asbestos Containing Materials

Any remaining LBP and ACM would be remediated prior to construction activities at the site. As long as workers follow the required Health and Safety Plan and Emergency Response Plan, **no impacts** related to LBP or ACM are expected from implementation of the Proposed Action. Asbestos-containing materials, LBP, paints containing chromate, and/or transformers containing polychlorinated biphenyl (PCB) fluid are prohibited from use during implementation of the Proposed Action. Noncompliance could generate Notices of Violation for Scott AFB and legal action could be implemented against the accountable contractor.

4.4.2 No-Action Alternative

There would be the potential for a **short-term adverse impact** to the environment from wastes or hazardous materials, if the No-Action Alternative were selected. Implementation of the Proposed Action would create an engineered barrier that would reduce the potential for exposure to contaminated soil. If No-Action is taken at the site, there is a slightly increased potential for exposure to contaminated soil. This potential for exposure to contaminated soil would remain until the site was remediated through the IRP

4.5 WATER RESOURCES

4.5.1 Proposed Action

No additional adverse impacts to groundwater quality are anticipated from the implementation of the Proposed Action. Groundwater at the site already contains elevated levels of contaminants and it is not anticipated that the construction of a parking lot would contribute to further groundwater contamination. Scott AFB is in the process of implementing a Land Use Control Memorandum of Agreement (LUC MOA) that prohibits the use of groundwater as a source of

drinking water. Therefore, contaminated groundwater is not considered an exposure route for petroleum contamination at the site of the Proposed Action (Tetra Tech, 2005).

No adverse impacts to surface water are anticipated as long as proper best management practices (BMPs) are used and any contaminated soil encountered during excavations is properly stockpiled and disposed of in accordance with Scott AFB, State, and Federal regulations. Proper BMP's vary according to site conditions but may include silt fences, hale bales, protection of storm water inlets, and seeding or otherwise protecting disturbed soils.

Observations conducted as part of the *35% Design Analysis Renovate Old Steam Plant, Building 45* (Burns and McDonnell, 2004) indicated that storm water drainage in the vicinity of the Proposed Action is currently sufficient. The Proposed Action would potentially reduce the amount of impervious surface in the vicinity of project, as the parking lot at the intersection of Yonkie Drive and Watnee Street would be converted to mowed turf grass.

Review of Federal Emergency Management Agency flood maps, Scott AFB wetland maps, and an on-site preliminary survey indicated that no floodplains or wetlands were present at the site of the Proposed Action. As a result, the action would have **no impact** to existing wetlands or floodplains. All appropriate measures and best management practices would be taken during construction activities to minimize erosion and control sedimentation.

4.5.2 No-Action Alternative

There would be **no impact** to surface water, groundwater, wetlands, or floodplains if this alternative were selected.

4.6 BIOLOGICAL RESOURCES

4.6.1 Proposed Action

There are no significant or unique biological resources located at the site of the Proposed Action. Therefore, **no adverse impacts** to biological resources are anticipated from implementation of the Proposed Action.

4.6.2 No-Action Alternative

No impact to biological resources would result from the implementation of this alternative.

4.7 SOCIOECONOMICS

4.7.1 Proposed Action

Short-term and long-term minor positive impacts for the construction industry and local economy are anticipated from implementation of the Proposed Action. Renovation of Building 45 would allow for utilization of a building that would otherwise remain vacant. The creation of the additional swing space would minimize work stoppages or delays as a result of renovations to other office space at Scott AFB. Completion of the Proposed Action would also resolve the need for swing space with the most economical option. The Proposed Action is not anticipated to

significantly increase employment at the base and as such there would be **no impact** to housing demands, populations, or educational needs, if the Proposed Action were implemented.

4.7.2 No-Action Alternative

There would be **short- and long-term minor adverse impact** to socioeconomics if the No-Action Alternative were implemented. Inadequate office space at Scott AFB would result in inefficiencies due to crowded working conditions.

4.8 CULTURAL RESOURCES

4.8.1 Proposed Action

Building 45 is listed as a historical building on the NRHP. Therefore any proposed changes to the building must undergo review by the SHPO. SHPO has been involved from the beginning design stages of this project and has determined that the Proposed Action would have **no adverse impacts** upon the historical integrity of the building provided certain conditions were followed. These conditions can be found in Appendix C and will be incorporated into the final project design. The renovations associated with Building 45 are anticipated to have a **long-term positive impact**. The positive impact would result from the exterior renovations that would contribute to weather proofing the building.

No impacts are anticipated from implementation of the Proposed Action; however, the discovery of an artifact or historical object would require all construction activities to cease until the Cultural Resource Specialist and/or the Base Historian is notified. Construction activities must not proceed until the aforementioned personnel provide approval. Archeological resources on either public or Native American lands cannot be excavated, removed, damaged, or otherwise altered without a permit (32 CFR 229.4(a)(5)(b)) and approval from the Cultural Resources Specialist at Scott AFB.

4.8.2 No-Action Alternative

There would be a **negative impact** to historical resources if the No-Action Alternative were selected. If the renovations to Building 45 do not occur the building would continued to be exposed to the elements and the condition of the building would continue to deteriorate.

4.9 LAND USE

4.9.1 Proposed Action

Construction of the new facility would involve the conversion of the current land use from an industrial facility to an administrative facility. There are both **short- and long-term positive impacts** associated with this conversion as it is in accordance with the BGP. When Scott AFB converted the centralized heating of the base facilities to smaller dispersed heating facilities the Steam Plant ceased to function as an industrial facility. The building has been vacant and unused since 1997. Due to the extreme shortage of administrative space at Scott AFB, it was determined that the area in the vicinity of the Former Steam Plant would better serve the base as administrative rather than industrial space.

4.9.2 No-Action Alternative

There would be **short- and long-term adverse impacts** to land use if this alternative were selected. Building 45 would continue to remain vacant and the condition of the building would continue to deteriorate.

4.10 TRANSPORTATION SYSTEMS

4.10.1 Proposed Action

Short-term minor increases in traffic are anticipated from construction vehicles, and could increase road hazards to the public during the construction phases of the Proposed Action.

Long-term minor increases in vehicular traffic at Scott AFB are not anticipated as a result of implementing the Proposed Action as it is anticipated that personnel using the facility will already be working at the base.

In summary construction traffic is anticipated to have a **short-term minor adverse impact** to the public, pending completion of the facility. No **long-term adverse impacts** are anticipated.

4.10.2 No-Action Alternative

There would be **no impacts** to transportation systems if the No-Action Alternative were implemented.

4.11 AIRSPACE/AIRFIELD OPERATIONS

4.11.1 Proposed Action

The Proposed Action is located outside of any clear zone or accident potential zone. Therefore, **no adverse impacts** to airspace or airfield operations are anticipated.

4.11.2 No-Action Alternative

No impacts to airspace/airfield operations are anticipated if the No-Action Alternative were selected.

4.12 SAFETY AND OCCUPATIONAL HEALTH

4.12.1 Proposed Action

No impacts to the health of occupational and construction workers are anticipated to occur with implementation of the Proposed Action, provided workers comply with OSHA regulations and standards during construction activities. The site in the vicinity of the former AST is known to contain soils contaminated with petroleum products and construction workers would follow an approved Health and Safety Plan and Emergency Response Plan to minimize exposure to contaminated soils. The former site of the Vehicle Maintenance facility is known to have

contaminated soils. No excavations would occur at this site and work would be limited to repaving the existing foundation and parking lot.

4.12.2 No-Action Alternative

There would be a **no impacts** to safety and health if the No-Action Alternative were implemented.

4.13 ENVIRONMENTAL MANAGEMENT – POLLUTION PREVENTION

4.13.1 Proposed Action

In support of national environmental efforts, the contractor would recycle all ferrous and non-ferrous metals from the project. The contractor would also recycle general administrative refuse associated with this project. This refuse includes cardboard, mark 1 and 2 plastic bottles, glass, aluminum and steel cans, and mixed paper. The Base Recycling Center, Building 3286, on South Drive will accept these items Monday through Friday between 0730 and 1500 and Saturdays between 0730 and 1100. The use of 'green' products, reuse/recycling, and minimization of solid or hazardous waste would be encouraged during new construction activities at the sites of the Proposed Action as part of the Affirmative Procurement Plan.

Implementation of the Proposed Action would have **no impacts** to pollution prevention or environmental management programs, provided the above guidelines are followed.

4.13.2 No-Action Alternative

If the No-Action Alternative were implemented, no construction activities would occur on site and **no impacts** to environmental management or pollution prevention programs would be anticipated.

4.14 GEOLOGY AND SOILS

4.14.1 Proposed Action

No additional adverse impacts to soils are anticipated from the implementation of the Proposed Action. Sub-surface soils at the site already contain elevated levels of contaminants and it is not anticipated that the construction of a parking lot would contribute to further contamination. The IRP site at the location of the former vehicle maintenance building would be remediated prior to the installation of a parking lot. Placing a concrete parking lot over the existing contaminated soils would limit the potential for exposure to these soils.

Construction contractors would use erosion control measures consistent with the Natural Resources Conservation Service Illinois Urban Manual. Necessary measures and best management practices would be implemented to reduce soil erosion and siltation during construction. Interim measures to prevent erosion during construction would be implemented and could include the installation of staked straw bales, sedimentation basins, and temporary mulching. Proper grading would be accomplished to allow water to flow from the roadway and into the drainage system, rather than standing and eroding the shoulder or pavement edge. All

construction areas with bare soil would be mulched and seeded immediately upon completion of construction.

Phase I of the National Pollutant Discharge Elimination System (NPDES) storm water program presently covers discharges from large construction activities disturbing five acres or more of land. Phase II of NPDES storm water program covers small construction activities disturbing between one and five acres. Phase II became final on December 8, 1999, with small construction permit applications due by March 10, 2003. "Disturbance" refers to exposed soil resulting from activities such as clearing, grading, and excavating. Construction activities may include road building, construction of residential houses, office buildings, and industrial sites, and demolition. Implementation of the Proposed Action is only anticipated to disturb approximately 0.5 acre of land. If land disturbance should exceed one acre then Scott AFB would be required to apply for a Phase II NPDES permit.

Implementation of the Proposed Action would have **no impact** to soils or geological resources, provided all of the aforementioned recommendations are applied.

4.14.2 No-Action Alternative

There would be **no impact** to geological resources or soils if the No-Action Alternative were selected since the proposed construction sites would remain undisturbed.

4.15 ENVIRONMENTAL JUSTICE

4.15.1 Proposed Action

There is no minority or low-income populations in the areas of the Proposed Action; therefore, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, is not applicable.

Implementation of the Proposed Action would have **no impact** to minority or low-income populations.

4.15.2 No-Action Alternative

The No-Action Alternative would have **no impact** to minority or low-income populations.

4.16 INDIRECT AND CUMULATIVE IMPACTS

4.16.1 Proposed Action

Several construction projects have occurred in the vicinity of the Proposed Action and several future projects are planned for the same area (see Section 3.16). Although Building 45 underwent a previous project in the recent past to remove the equipment from the steam plant and remediate ACM and LBP, this action is not anticipated to have a cumulative impact when considered with the Proposed Action. SHPO reviewed the plans for the Proposed Action, toured Building 45 subsequent to the removal of the equipment and made a determination of no adverse affects.

Other projects planned for the future in the vicinity of Building 45 are not anticipated to have significant adverse cumulative effects. Any new projects would require NEPA review prior to the design and construction of additional facilities. There are **no known indirect impacts** that have not already been discussed under the appropriate category.

4.16.2 No-Action Alternative

No indirect or cumulative impacts are anticipated under the No-Action Alternative.

4.17 UNAVOIDABLE ADVERSE IMPACTS

4.17.1 Proposed Action

There are several short-term unavoidable minor adverse impacts summarized in Table 4-2 on the following page; however, there would be **no unavoidable significant adverse impacts** if the Proposed Action were implemented.

4.17.2 No-Action Alternative

There are several short-term unavoidable minor adverse impacts summarized in Table 4-2 on the following page; however, there would be **no unavoidable significant adverse impacts** if the No-Action Alternative were implemented. Potential impacts are summarized in Table 4-2 and include impacts to socioeconomics, transportation systems, and safety and occupational health.

4.18 SUMMARY TABLE OF ENVIRONMENTAL CONSEQUENCES

Table 4-2 provides a summary of the potential environmental impacts of the Proposed Action and the No-Action Alternative.

Table 4-2. Comparison of Environmental Consequences*

Environmental Resources	Proposed Action	No-Action Alternative
Air Quality	Short-term – **Minor Adverse Impact** Long-term – No Impact	Short-term – No Impact Long-term – No Impact
Noise	Short-term – **Minor Adverse Impact** Long-term – No Impact	Short-term – No Impact Long-term – No Impact
Wastes, Hazardous Materials and Stored Fuels	Short-term – **Minor Positive Impact** Long-term – No Impact	Short-term – **Minor Adverse Impact** Long-term – No Impact
Water Resources	Short-term – No Impact Long-term – **Minor Adverse Impact**	Short-term – No Impact Long-term – **Minor Adverse Impact**
Socioeconomics	Short-term – **Minor Positive Impact** Long-term – **Minor Positive Impact**	Short-term – **Minor Adverse Impact** Long-term **– Minor Adverse Impact**
Cultural Resources	Short-term – No Impact Long-term – **Minor Positive Impact**	Short-term – No Impact Long-term – **Minor Adverse Impact**
Land Use	Short-term – **Minor Positive Impact** Long-term – **Minor Positive Impact**	Short-term – **Minor Adverse Impact** Long-term – **Minor Adverse Impact**
Transportation Systems	Short-term – **Minor Adverse Impact** Long-term – No Impact	Short-term – **Minor Adverse Impact** Long-term – No Impact
Unavoidable Adverse Impacts	Short-term – **Minor Adverse Impact** Long-term – **Minor Adverse Impact**	Short-term – **Minor Adverse Impact** Long-term – **Minor Adverse Impact**

*Environmental resources having **no impact** have been excluded from this matrix.

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6.0 LIST OF PREPARERS

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APPENDIX A
AIR FORCE FORM 813

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REQUEST FOR ENVIRONMENTAL IMPACT ANALYSIS

Report Control Symbol
RCS:

INSTRUCTIONS: *Section I to be completed by Proponent. Sections II and III to be completed by Environmental Planning Function. Continue on separate sheets as necessary. Reference appropriate item number(s).*

SECTION I – PROPONENT INFORMATION

1. TO *(Environmental Planning Function)*	2. FROM *(Proponent Organization and functional address symbol)*	2a. TELEPHONE NO.
375 CES/CEV 177 Hangar Road Scott AFB, IL 62225	375 CES 701 Hangar Road Scott, AFB 62225-5035	Art Wiesen 1-618-256-8514 Bill Micka 1-618-256-4764

3. TITLE OF PROPOSED ACTION

Renovate Old Steam Plant, Bldg. 45 Scott AFB

4. PURPOSE AND NEED FOR ACTION *(Identify decision to be made and need date)*

(see attached)

5. DESCRIPTION OF ACTION AND ALTERNATIVES (DOPAA) *(Provide sufficient details for evaluation of the total action)*

(see attached)

6. PROPONENT APPROVAL (Name and Grade)	6a. SIGNATURE	6b. DATE
Art Wiesen, GS-11		

SECTION II – PRELIMINARY ENVIRONMENTAL SURVEY *(Check appropriate box and describe potential environmental effects including cumulative effects) (+=positive effect; 0=no effect; - = adverse effect; U=unknown effect)*	+	0	-	U
7. AIR INSTALLATION COMPATIBLE USE ZONE/LAND USE *(Noise, accident potential, encroachment, etc.)*		x		
8. AIR QUALITY *(Emissions, attainment status, state implementation plan, etc.)*		x		
9. WATER RESOURCES *(Quality, quantity, source, etc.)*				x
10. SAFETY AND OCCUPATIONAL HEALTH *(Asbestos/radiation/chemical exposure, explosives safety quantity distance, bird/wildlife aircraft hazard, etc.)*				x
11. HAZARDOUS MATERIALS/WASTE *(Use/storage/generation, solid waste, etc.)*		x		
12. BIOLOGICAL RESOURCES *(Wetlands/floodplains, threatened or endangered species, etc.)*		x		
13. CULTURAL RESOURCES *(Native American burial sites, archaeological, historical, etc.)*	x			
14. GEOLOGY AND SOILS *(Topography, minerals, geothermal, Installation Restoration Program, seismicity, etc.)*				x
15. SOCIOECONOMIC *(Employment/population projections, school and local fiscal impacts, etc.)*	x			
16. OTHER *(Potential impacts not addressed above.)*				

SECTION III – ENVIRONMENTAL ANALYSIS DETERMINATION

17.		
		PROPOSED ACTION QUALIFIES FOR CATEGORICAL EXCLUSION (CATEX) #_____; OR
	x	PROPOSED ACTION DOES NOT QUALIFY FOR A CATEX; FURTHER ENVIRONMENTAL ANALYSIS IS REQUIRED.

18. REMARKS

9. May need stormwater permit.
14. Fuel contaminated soils and groundwater may be encountered if any excavation is required.
16. Soils need to be tested prior to any soil removal in the area of the AST containment and in the location of the former Building 53.

19. ENVIRONMENTAL PLANNING FUNCTION CERTIFICATION (Name and Grade)	19 a. SIGNATURE	19 b. DATE

4.0 PURPOSE AND NEED FOR ACTION

The first floor of the steam plant will be renovated to provide swing space for approximately 80 people during construction of other buildings on base. The exterior work will be limited to removal of the remaining containment dike for an old fuel tank, removed under a previous contract and any abatement required to the site. The abated areas will then be paved to add additional parking areas to the existing parking lot.

4.1 Purpose of the Action

There is insufficient space on base to provide swing space for personnel dislocated for repairs or alterations to existing space.

4.2 Need for the Action

There is insufficient space on base to provide swing space for personnel dislocated for repairs or alterations to existing space.

4.3 Related EISs/EAs and Other Documents

Unknown

5.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

5.1 Description of the Proposed Action

The first floor of the existing building will be completely restored with new plumbing facilities, electrical, mechanical and fire protection services. The structure will receive new hardwalled conference rooms and restrooms. Systems furniture will be utilized for the interior office space to allow for maximum flexibility in adapting to each new occupant for the swing space.

5.2 Anticipated Environmental Issues

Ground soil contamination at the containment dike to be removed

5.3 Design, Evaluation, and Selection Criteria

After careful study by the design consultant we have arrived at a design which maximizes the space of the structure for our intended use as swing space with a minimum impact to the exterior of the building proper. The exterior will be repaired only to the extent required to seal the exterior envelope and create a covered entry to the existing parking area. Parking will only be increased by reclamation of the old containment area into the existing parking scheme and by making repairs to the lot previously occupied by Building 53.

5.4 Description of Alternatives

5.4.1 No-Action Alternative

If not undertaken the shortage of swing space on base will remain unimproved, necessitating the Air Force to seek other more costly remedies to the problem of providing space for personnel dislocated by other necessary construction projects.

5.4.2 Proposed Action

The first floor of the existing building will be completely restored with new plumbing facilities, electrical, mechanical and fire protection services. The structure will receive new hardwalled conference rooms and restrooms. Systems furniture will be utilized for the interior office space to allow for maximum flexibility in adapting to each new occupant for the swing space.

5.4.3 Other Reasonable Action Alternatives

The other alternatives are:

A. To lease space off base.

B. To lease modular units and install on base.

Lease of space off base is expensive, disruptive to most mission capabilities and difficult and expensive to resolve AT/FP issues.

Lease of Modular units is expensive and requires installation in areas that results in a serious reduction of already limited parking on base.

5.5 List of Required Permits

Unknown

5.6 Recommended Level of Documentation

Unknown

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APPENDIX B
SITE PHOTOGRAPHS

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Former Steam Plant (Building 45)

View facing southeast at the Former Steam Plant.

View facing east at the Former Steam Plant.

View facing northwest at the site. Rimkus Drive is visible in the foreground and Yonkie Drive is visible in front of the Former Steam Plant

View facing southwest from the intersection of Watnee Street and Yonkie Drive. The parking lot visible at this intersection would be removed.

Former AST and Vicinity

View facing east along the northwest side of the Former Steam Plant. The containment wall is located to the left.

View facing west along Watnee Street. The former containment wall for the fuel oil AST is visible.

View facing south at the containment wall.

View facing south. The existing parking lot would tie into the proposed parking lot visible to the right of the photograph.

Gas Station and the Location of the Former Building 53

View facing east at the gas station south of Building 45.

View facing southeast at the former location of Building 53. Yonkie Drive is visible in the photograph.

View facing northeast at the former location of Building 53. Building 54 is visible in the background.

View facing southwest at the former parking lot of Building 53. A monitoring well is visible near the center of the photograph. Building 52 is visible in the background.

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APPENDIX C
AGENCY CORRESPONDENCE

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 375TH AIRLIFT WING (AMC)

3 June 2005

Ms. Maria T. Lanctot
Natural & Cultural Resources Manager
375th CES/CEV
701 Hangar Road; Building 56
Scott AFB IL 62225-5035

Ms. Anne Haaker
Deputy State Historic Preservation Officer
Illinois Historical Preservation Agency
#1 Old State Capital Plaza
Springfield, IL 62701-1507

RE: Renovate Building 45 – Old Steam Plant, Scott AFB IL
IHPA Log # 008112904

Dear Ms. Haaker

Thank your for your response to our submittal of the 95% Design Specifications and Plans for our project to renovate Building 45 – Old Steam Plant. In response to the condition you listed, I would like to offer the following information:

> The existing steel windows are being retained on the upper levels. We are only replacing the broken Kalwall glazing panes in the existing steel frame to restore the exterior envelope's water resistant integrity. The windows being replace are either on the first floor or they are the T-111 siding and double hung windows which are being replaced to the same standard as the first floor windows. These openings have been "re-muddled" in the past and our intent is to replace them to match the original design, as close as possible, using the same system on the first floor and as was approved for use on Hangar #01, Bldg. 433.

Enclosed are pictures of the windows as they currently exist. Therefore, this letter serves as notice of our agreement with the conditions as stated in your 23 May 2005 letter. Thank you for your review or our plans and specification for this project.

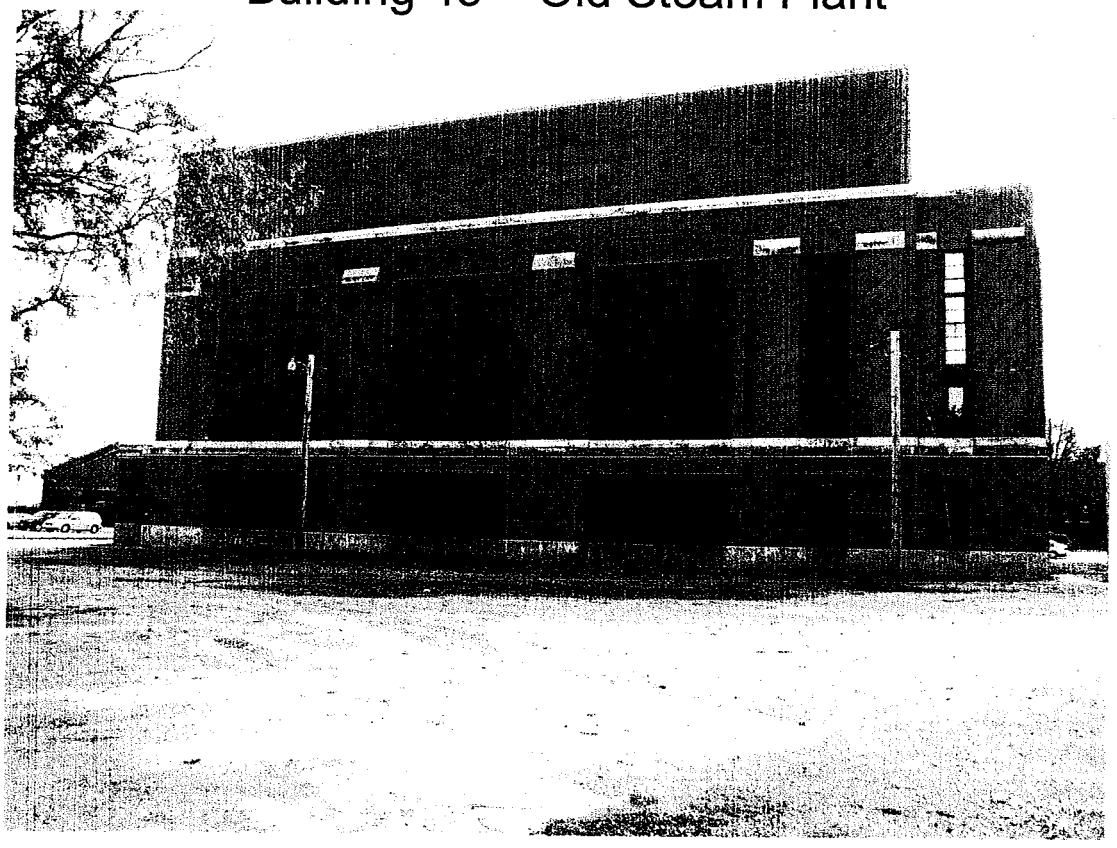
If you should have any questions, please feel free to call me at (618) 256-2092 or our project manager/architect Mr. Art Wiesen at (618) 256-8514.

Sincerely,

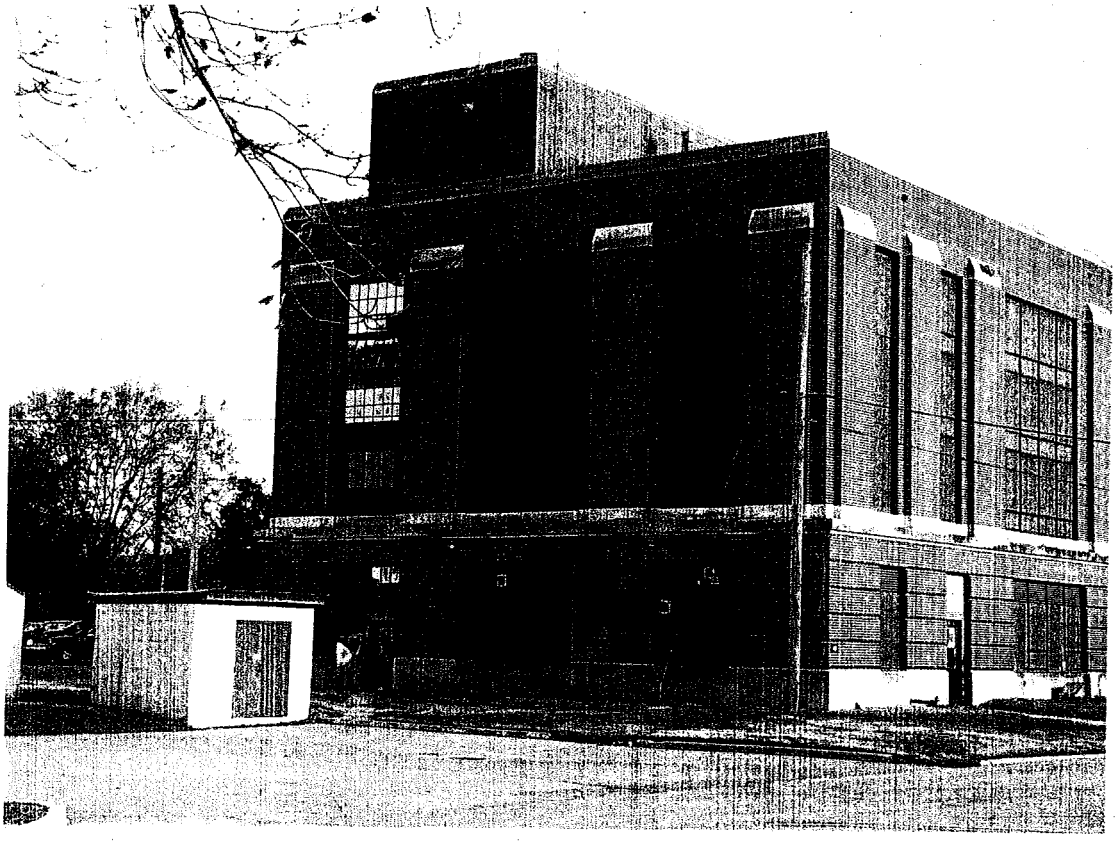
Maria T. Lanctot
Natural & Cultural Resources Manager

Attachments:
Building 45 - Photographs

Building 45 – Old Steam Plant



Building 45 – Northeast Corner View



Building 45 – Southwest Corner View

Illinois Historic Preservation Agency

Voice (217) 782-4836
1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Teletypewriter Only (217) 524-7128

St. Clair County
O'Fallon
Renovation; Scott AFB Steam Plant
Building 45

USAF,
IHPA Log #008112904

January 25, 2005

Andy Rodriguez
Department of the Air Force
375 CES/CEVR
701 Hangar Road
Building 56
Scott AFB, IL 62225-5035

Dear Mr. Rodriguez:

We have reviewed the 65% construction documents submitted for the referenced project. This property contributes to the *Scott Field Historic District* which was listed on the National Register of Historic Places on March 10, 1994.

In our opinion, the project meets the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" and we concur in a finding of *no adverse effect* pursuant to 36 CFR Part 800 provided that the following conditions are met:

- The surviving windows on the upper floors should be retained. It is acceptable to install new exterior insulated panels in front of the original steel sash.

Notifying our office of agreement with these conditions and the subsequent submission(s) of further developed plans (with these revisions) for our review will constitute compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

If you have any questions, please contact Cody Wright, Cultural Resource Manager, Illinois Historic Preservation Agency, Old State Capitol Plaza, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer

Illinois Historic
Preservation Agency

Voice (217) 782-4836
1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Teletypewriter Only (217) 524-7128

St. Clair County
O'Fallon
Renovation; Scott AFB Steam Plant
Building 45

USAF,
IHPA Log #008112904

May 23, 2005

Andy Rodriguez
Department of the Air Force
375 CES/CEVR
701 Hangar Road
Building 56
Scott AFB, IL 62225-5035

Dear Mr. Rodriguez:

We have reviewed the 95% Design Specifications and Plans for the referenced property which contributes to the Scott Field Historic District (listed on the National Register of Historic Places on March 10, 1994).

In our opinion the project meets the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" and we concur in a finding of no adverse effect pursuant to 36 CFR Part 800 provided that the following conditions are met:

- The existing and original steel windows should be retained on the upper floors of this building. The use of new exterior infill panels on these windows is acceptable provided they are installed on the exterior of the original windows.

Notifying our office of agreement with these conditions and their subsequent implementation constitutes compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

If you have any questions, please contact Cody Wright, Cultural Resources Manager, Illinois Historic Preservation Agency, Old State Capitol, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer
AEH

Illinois Historic
Preservation Agency

Voice (217) 782-4836
1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Teletypewriter Only (217) 524-7128

St. Clair County
O'Fallon
Renovation; Scott AFB Steam Plant
Building 45
IHPA Log #008112904

December 20, 2004

Andy Rodriguez
Department of the Air Force
375 CES/CEVR
701 Hangar Road
Building 56
Scott AFB, IL 62225-5035

Dear Mr. Rodriguez:

We have reviewed the 35% design analysis and design plan documentation provided for the referenced project. This property is a contributing building within the Scott Field Historic District, which was listed on the National Register of Historic Places on March 10, 1994.

In our opinion the project meets the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" and we concur in a finding of no adverse effect pursuant to 36 CFR Part 800 provided that the following conditions are met:

1. The surviving windows on the upper floors should be retained.
2. The design of any replacement windows of the ground floor should match the original steel sash in configuration and detail, but the material can be steel or aluminum. The divided light sash should have true divided lights. One acceptable manufacture of replacement sash is:

   www.customwindow.com

Notifying our office of agreement with these conditions and their subsequent implementation constitutes compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

If you have any questions, please contact Cody Wright, Cultural Resource Manager, Illinois Historic Preservation Agency, 1 Old State Capitol Plaza, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer

APPENDIX D
PUBLIC COMMENTS

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The Draft Environmental Assessment and Finding of No Significant Impact for the Former Steam Plant EA were released for public comment from August 26, 2005 to September 12, 2005. The Public Notice as it appeared in the Belleville News Democrat is included below. No public comments were received.

PUBLIC NOTICE OF AVAILABILITY

Department of the Air Force
Scott Air Force Base
375th CEV

Notice of Availability of the *Draft Environmental Assessment (EA) for the Renovation of the Former Steam Plant, St. Clair County, Scott Air Force Base, Illinois.*

Pursuant to the National Environmental Policy Act (NEPA) of 1969 and the Council on Environmental Quality, a Draft EA has been prepared to analyze the potential impacts associated with the renovation of the former steam plant. The former steam plant is listed on the National Register of Historic Places and is located in the historic district at Scott AFB. The Draft EA is available for public review at the Belleville Public Library-Main Branch 121 East Washington Street, Belleville, Illinois.

Public Comments on the EA will be accepted for 15 days from the date of this notice. Written comments and inquiries on the EA should be directed to: 375th Airlift Wing, Public Affairs Office, Fax: (618) 256-8837, or E Mail 375AW.PA@SCOTT.AF.MIL

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FINDING OF NO SIGNIFICANT IMPACT TO RENOVATE THE FORMER STEAM PLANT SCOTT AIR FORCE BASE, ILLINOIS

Agency: United States Air Force, Headquarters, Air Mobility Command

Background: Pursuant to the President's CEQ regulations, {Title 40 Code of Federal Regulations (CFR) Parts 1500-1508}, the National Environmental Policy Act of 1969 {42 USC §4321, et seq.}, and the Environmental Impact Analysis Process, as promulgated at 32 CFR Part 989, the U.S. Air Force conducted an Environmental Assessment of the potential consequences associated with the renovation of the Former Steam Plant (Building 45) at Scott AFB, IL. The EA considered potential natural resources, environmental, and cultural impacts of the renovation of the Former Steam Plant (hereinafter, "Proposed Action") and listed alternatives. This Finding of No Significant Impact (FONSI) summarizes the results of this EA and provides the U.S. Air Force's rationale for the Proposed Action and No-Action Alternative.

PROPOSED ACTION: The Proposed Action consists of interior renovations to the Former Steam Plant (Building 45) to convert the building to administrative space. In addition to the interior renovations, the project would include removal of the containment dike for a former AST and exterior improvements to prepare the facility for use as administrative space.

Alternatives: The alternative to the Proposed Action is the No-Action. Implementation of the No-Action Alternative does not alleviate the lack of swing space at Scott AFB.

Cultural and Historical Resources: The Proposed Action is located in the Historical District at Scott AFB. Building 45 is listed on the National Register of Historic Places. The State Historic Preservation Office has been notified of this project and has determined that the Proposed Action would have no adverse affect. No artifacts or historical objects are expected to be excavated during construction. In the unlikely event artifacts or historical objects are discovered, construction activities would cease until the Cultural Resources Specialist and Base Historian are notified and the appropriate action is accomplished.

Air Quality: Fugitive dust and construction vehicle exhaust would be generated during construction of the Proposed Action. The estimated values of direct and indirect emissions are below the *de minimus* thresholds specified at 40 CFR 93.153(b)(1). Therefore, the Proposed Action would not increase emissions over baseline emission levels. The Proposed Action would be in compliance with all relevant requirements and milestones contained in the Illinois State Implementation Plan; therefore, a conformity determination would not be necessary.

Hazardous Materials and Waste: The site of the Proposed Action is located in the vicinity of several IRP and AOC sites and there is a potential for contaminated soils to be encountered during construction activities. No impacts related to potential contamination are expected as long as workers follow an approved Health and Safety Plan and Emergency Response Plan. Any potentially contaminated soils encountered during excavation would be stockpiled on-site and disposed of in accordance with appropriate Scott AFB, State, and Federal regulations.

The use of hazardous materials during construction activities would be limited, and generation of hazardous waste would not be anticipated from the Proposed Action. There would be no anticipated impact to human health or the environment during construction activities or from activities associated with implementation of the Proposed Action.

Noise: Some noise impacts would occur during the construction of the Proposed Action. The amount of noise generated from operational activities would be temporary and negligible.

Geology and Soils: The surface area would be disturbed by construction activities at the Proposed Action; however, construction would not negatively affect surface or geological resources. Necessary measures and best management practices would be utilized to prevent soil erosion during and after construction activities. Subsurface soils at the site already contain elevated levels of contaminants and it is not anticipated that the Proposed Action would contribute to further contamination. The portion of the project that was formerly utilized as a vehicle maintenance building would be remediated prior to construction. Placing a concrete parking lot over portions of the subject site would limit the potential for exposure to these soils.

Water Resources: No significant impact to groundwater quality is anticipated from the implementation of the Proposed Action. Groundwater at the site already contains elevated levels of contaminants and it is not anticipated that implementation of the Proposed Action would contribute to further groundwater contamination. Scott AFB is in the process of implementing a Land Use Control Memorandum of Agreement (LUC MOA) that prohibits the use of groundwater as a source of drinking water.

No significant impact to surface water is anticipated as long as proper BMP's are used and any contaminated soil encountered during excavations is properly stockpiled and disposed of in accordance with Scott AFB, State, and Federal regulations.

Due to the lack of detailed information at Spill Site 2 the long-term impacts of potential contaminants can not be completely ruled out. Therefore there is a potential for a long-term minor adverse impact to groundwater.

There are no wetlands or floodplains present at the site of the Proposed Action. Therefore, no impacts are anticipated to these resources.

Safety and Occupational Health: If the Proposed Action is implemented, no unfavorable impacts to occupational health and safety are projected provided workers comply with OSHA regulations and standards during construction activities. The site is known to contain soils contaminated with petroleum products and construction workers would follow an appropriate Health and Safety Plan and Emergency Response Plan to minimize exposure to contaminated soils.

Biological Resources: No biological resources, including endangered or threatened species, or rare fauna and flora inhabit the Proposed Action area. As such, no impacts are probable.

Ordnance: No ordnance is associated with the Proposed Action. There would be no impacts relating to ordnance.

Environmental Justice: There would be no disproportionately high or adverse impact on minority or low-income populations as a result of the Proposed Action.

Indirect and Cumulative Impacts: No impacts are anticipated from site-specific, direct, indirect, or cumulative impacts associated with the Proposed Action.

Relationship Between Short-term Uses and Enhancement of Long-Term Productivity: Implementation of the Proposed Action would facilitate long-term productivity at Scott AFB. The ability to utilize swing space during other renovation projects would minimize impacts created by displacing base personnel or requiring personnel to work in overcrowded conditions.

Irreversible and Irretrievable Commitment of Resources: There would be minor irreversible and irretrievable commitment of resources if the Proposed Action were selected. Military funds would be permanently expended, building materials would be permanently committed for construction, and the area proposed for new construction would be a long-term commitment of resources. However, the overall impact would be considered inconsequential.

Unavoidable Adverse Impacts: There would be no major unavoidable adverse impacts associated with the Proposed Action.

FINDING OF NO SIGNIFICANT IMPACT: Based upon my review of the facts and analyses contained in the attached Environmental Assessment for the Renovation of the Former Steam Plant dated September 2005, I conclude that implementation of the Proposed Action would not have a significant adverse impact, either by itself or cumulatively with other projects at Scott AFB. Accordingly, the requirements of NEPA, the CEQ regulations, and 32 CFR 989 are fulfilled and an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the environmental impact analysis process under Air Force Regulations.

_____ _____

ALAN L. HUNT, JR., Colonel, USAF DATE
Commander

Attachment:
Environmental Assessment